

EXHIBIT “14”

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK
4 Docket No.: 1:22-cv-02834-PKC-MMH

5 - - - - -x
6 GOVERNMENT EMPLOYEES INSURANCE COMPANY,
7 GEICO INDEMNITY COMPANY, GEICO GENERAL
8 INSURANCE COMPANY and GEICO CASUALTY
9 COMPANY,

Plaintiffs,

-against-

10 ELENA BORISOVNA STYBEL, D.O., ELENA
11 BORISOVNA STYBEL, M.D., (A Sole
12 Proprietorship), EVERGREEN & REMEGONE LLC,
13 YANA MIRONOVICH, NEW YORK BILLING AND
14 PROCESSING CORP., ERIC MELADZE BLUE TECH
15 SUPPLIES, INC., SUNSTONE SERVICES, INC.,
16 and JOHN DOE DEFENDANTS "1" through "10",

Defendants.

17 - - - - -x

18 February 16, 2023
19 10:25 a.m.

20 DEPOSITION of DENNIS BALTER, a
21 Non-Party Witness, in the above-entitled
22 action, held via remote proceeding, taken
23 before IRIS FERNHOFF, a Shorthand Reporter
24 and Notary Public of the State of New
25 York, pursuant to the Federal Rules of
Civil Procedure, and stipulations between
Counsel.

1
2 APPEARANCES:
3

4 RIVKIN RADLER LLP
Attorneys for Plaintiffs
926 RXR Plaza
5 Uniondale, New York 11556
6 BY: GARIN SCOLLAN, ESQ.
7
8

9 JOHN J. RAPAWY, ESQ.
Attorney for Defendants
Elena Borisovna Stybel, D.O., Elena
10 Borisovna Stybel, M.D., (A Sole
Proprietorship)
11 900 South Avenue, 3rd Fl
Staten Island, New York 10314
12

13 NOT PRESENT
14

15 MESTECKIN LAW GROUP, P.C.
Attorney for Romgo Tech Services, Inc.
16 and Non-Party Witness, Dennis Balter
1733 Sheepshead Bay Road
17 Brooklyn, New York 11235
18 BY: OLEG A. MESTECKIN, ESQ.
19
20

21 ALSO PRESENT:

22 TAMARA KARAPETIAN, Eiber
Translations, Russian Interpreter
23

24 * * *
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED, by
and among counsel for the respective
parties hereto, that the filing, sealing
and certification of the within deposition
shall be and the same are hereby waived;

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to form of
the question, shall be reserved to the
time of the trial;

IT IS FURTHER STIPULATED AND AGREED
that the within deposition may be signed
before any Notary Public with the same
force and effect as if signed and sworn to
before the Court.

* * *

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T A M A R A K A R A P E T I A N ,
called as the interpreter in this
matter, was duly sworn by a Notary Public
of the State of New York to accurately and
faithfully translate the questions
propounded to the witness from English
into Russian and the answers given by the
witness from Russian into English.

-oOo-

D E N N I S N E P T U N E ,
the witness herein, having been first
duly sworn by a Notary Public of the State
of New York, was examined and testified
through the interpreter as follows:

THE COURT REPORTER: State your
name for the record, please.

THE WITNESS: Dennis Balter.

THE COURT REPORTER: State your
address for the record, please.

THE WITNESS: 545 Neptune
Avenue, Apartment 17G, Brooklyn, New
York 11224.

1 D. Balter

2 EXAMINATION BY

3 MR. SCOLLAN:

4 Q. Good morning. My name is Garin
5 Scollan, and I'm an attorney with Rivkin
6 Radler, LLP, counsels for plaintiffs in
7 this matter collectively known as GEICO.

8 We are here today for the
9 deposition of non-party Dennis Balter in
10 connection with an amended complaint that
11 was filed by GEICO against certain
12 individuals and entities including Elena
13 Borisovna Stybel, the sole proprietorship
14 under Elena Borisovna Stybel, M.D. and
15 Yana Mironovich.

16 I have marked as Exhibit 1; it's
17 just a copy of the subpoena that was
18 previously served on Mr. Balter. Again,
19 relating to the matter Government
20 Employees Insurance Company, et al v.
21 Stybel et al.

22 [The document was hereby marked
23 as Exhibit 1 for identification, as of
24 this date.]

25 BY MR. SCOLLAN:

1 D. Balter

2 Q. And, Mr. Balter, can you see and
3 hear me so far?

4 A. Yes.

5 Q. I just want to go over some
6 instructions for this deposition. Some
7 ground rules.

8 We have a court reporter, so
9 it's very, very important that you give
10 verbal answers to questions and that you
11 speak up.

12 If you do not understand a
13 question, please let me know and I'll do
14 my best to rephrase the question.

15 It's also very important for the
16 court reporter and for the record that
17 only one person speaks at a time, so I'll
18 do my best to allow you to finish your
19 answers and you'll do your best to allow
20 me to finish my questions.

21 Sounds good?

22 Does that sound good, Mr.
23 Balter?

24 THE INTERPRETER: He was nodding
25 his head.

1 D. Balter

2 BY MR. SCOLLAN:

3 Q. It's just very important that
4 you give a verbal answer to the question,
5 okay?

6 MR. MESTECHKIN: You have to
7 (speaking in Russian).

8 A. Okay.

9 Q. If you need to take a break or
10 speak to your attorney, that's fine. I
11 just ask if there's a pending question
12 that you answer the question first.

13 A. Okay.

14 Q. Do you understand that you're
15 under oath as if you were in a court of
16 law?

17 A. Yes.

18 Q. And obviously we're doing this
19 virtually, so if you can't hear me or if
20 my video breaks out at any time, just let
21 me know right away, okay?

22 A. Okay.

23 Q. Are you under the influence of
24 anything that would impair your ability to
25 testify truthfully and accurately today?

1 D. Balter

2 A. No.

3 Q. Also. If you think that an
4 answer that you gave was misinterpreted,
5 just let us know right away so we can
6 clarify your answer. Sound good?

7 A. Okay.

8 Q. Other than your attorney, did
9 you speak with anyone else about your
10 deposition?

11 A. No.

12 Q. Where do you work?

13 A. I do medical tests at the
14 medical office.

15 Q. What kind of medical tests?

16 A. Functional capacity.

17 Q. And do you do those tests
18 through a specific company?

19 A. Yes.

20 Q. Which company?

21 A. Can I check it on my phone?

22 Q. Sure.

23 MR. MESTECKIN: You have to
24 respond.

25 A. Could you clarify the question,

1 D. Balter

2 please? Are you asking for the name of my
3 company?

4 Q. The company that you perform the
5 functional capacity test through.

6 A. FCTE Tech Service.

7 Q. And you mentioned a medical
8 office. What medical office do you
9 provide the functional capacity test at?

10 A. Do you need the address of the
11 office?

12 Q. I was asking the address where
13 the functional capacity tests are done.

14 A. 1251 Ralph Avenue.

15 Q. Is that in Brooklyn?

16 A. Yes.

17 Q. Do you perform functional
18 capacity tests through FCTE Tech Service
19 at any location other than Ralph Avenue?

20 A. Yes.

21 Q. Can you name all the offices
22 where you've done so?

23 A. 146 Empire Boulevard, and 1975
24 Linden Boulevard.

25 Q. Anywhere else?

1 D. Balter

2 A. No.

3 Q. Does FCTE Tech Service bill or
4 treat No-Fault patients?

5 A. Yes, they do provide treatment.

6 Q. And through that company you
7 provide treatment to No-Fault patients,
8 correct?

9 A. Yes.

10 Q. Do you work for any other
11 company other than FCTE Tech Service?

12 A. No.

13 Q. Have you worked for any other
14 companies other than FCTE Tech Service
15 since 2021?

16 A. (Inaudible).

17 MR. SCOLLAN: Did he say "no"?

18 A. I said, yes.

19 Q. I apologize.

20 So since 2021, where else have
21 you worked?

22 A. You need the name of the company
23 that I worked for.

24 Q. Yes, please.

25 A. Romgo Tech Service Inc.

1 D. Balter

2 THE INTERPRETER: So it's

3 R-O-M-G-O, Romgo.

4 THE WITNESS: Yes.

5 BY MR. SCOLLAN:

6 Q. Since 2021, have you worked
7 anywhere else other than Romgo Tech or
8 FCTE Tech Service?

9 A. No.

10 Q. Do you own FCTE Tech Service?

11 A. Yes, yes.

12 Q. Are you the 100% owner?

13 A. Yes.

14 Q. You testified to this company.
15 How are you familiar with the company
16 called Romgo Tech Service, Inc.?

17 A. That is my wife's company, and I
18 work with that company and perform tests.

19 Q. Who is your wife?

20 A. Olesya Grechishkina.

21 Q. I will refer to Romgo Tech
22 Service, Inc., as Romgo going forward.

23 You're obviously aware
24 Mr. Balter that Romgo was previously
25 served a subpoena in this case for

1 D. Balter

2 requesting certain documents, correct?

3 A. Yes.

4 Q. And when -- and you assisted
5 with getting the documents together in
6 response to that subpoena, correct?

7 A. Yes.

8 Q. Did you speak to your wife about
9 the subpoena?

10 A. Yes.

11 Q. Did you speak to anybody else?

12 A. No.

13 Q. Do you know a person named Yana
14 Mironovich?

15 A. Yes.

16 Q. I'm going to refer to her as
17 Yana.

18 Did you speak to Yana about the
19 subpoena that was served on Romgo?

20 A. No.

21 Q. Did you speak with anyone other
22 than your wife about the subpoena?

23 A. No.

24 Q. What kind of company is Romgo?

25 A. Romgo provides a medical

1 D. Balter

2 service.

3 Q. What medical service?

4 A. Technical services or technician
5 services.

6 Q. Can you explain what kind of
7 technical or technician services Romgo
8 provides?

9 A. So a technician would go to the
10 office and do a test called shockwave.

11 Q. Since inception, has Romgo
12 provided any other services other than
13 these technical services you just
14 described?

15 A. No.

16 Q. How long has Romgo been
17 providing these technical services?

18 A. For about a year and a half.

19 Q. Are you the manager of Romgo?

20 A. Yes.

21 Q. Since inception, have you been
22 the manager of Romgo?

23 A. Yes.

24 Q. Other than performing tests for
25 Romgo, can you please describe your other

1 D. Balter

2 responsibilities as manager of Romgo?

3 A. My responsibility was to find a
4 person who would do the test, teach them
5 how to do the test and send them to the
6 office.

7 Q. Do you personally perform any
8 technician services on behalf of Romgo?

9 A. Yes.

10 Q. When is the last time you did
11 that?

12 A. Also about a year ago probably.

13 Q. Do you have any certifications
14 to provide these technical services?

15 A. I have a certificate from
16 Chattanooga Company and from Udeme.com.

17 THE INTERPRETER: Maybe we can
18 ask the witness to spell that because
19 I'm not familiar.

20 Q. Can you spell that please?

21 A. U-D-E-M-E.com.

22 Q. Can you just describe what you
23 had to do to earn those certificates?

24 A. I had to attend a lecture and
25 answer questions.

1 D. Balter

2 Q. How long is the lecture?

3 A. About 30 or 40 minutes.

4 Q. And you did so online?

5 A. Yes.

6 Q. Do you know who taught the
7 lecture?

8 A. I don't know.

9 Q. Do you maintain copies of all
10 the certificates that you have to provide
11 technical services?

12 A. Yes.

13 MR. SCOLLAN: GEICO just calls
14 for the preservation of those
15 certificates.

16 THE WITNESS: Okay.

17 BY MR. SCOLLAN:

18 Q. Other than what you've already
19 described, do you do anything else on
20 behalf of Romgo?

21 A. No.

22 Q. Is your wife the 100% owner of
23 Romgo?

24 A. Yes.

25 Q. And what does she do on behalf

1 D. Balter

2 of Romgo?

3 A. Nothing.

4 Q. So why does she own it?

5 A. Because there was a time when I
6 was busy and she started the company.

7 Q. Since what date has your wife
8 performed no duties on behalf of Romgo?

9 A. Since day one.

10 Q. Does anybody work for Romgo
11 other than you?

12 A. Yes.

13 MR. MESTECHKIN: If you don't
14 understand the question, you have to
15 let them know.

16 A. Do you want to know if there are
17 other technicians working for Romgo?

18 Q. Good question.

19 So other than you and the
20 technicians who perform the actual
21 technical services, does anybody else work
22 for Romgo?

23 A. No.

24 Q. What's Romgo's business address?

25 A. 1980 East 22nd Street, Apartment

1 D. Balter

2 205, Brooklyn, New York 11229.

3 Q. Does Romgo have a phone number?

4 A. Yes.

5 Q. What is it?

6 A. (646) 420-7283.

7 Q. Other than the Gmail account,
8 which you sent me documents through, does
9 Romgo have an e-mail address?

10 A. Yes.

11 Q. What is it?

12 A. Dennismironov@gmail.com.

13 D-E-N-N-I-S-M-I-R-O-N-O-V@gmail.com.

14 Q. Do you also go by Dennis
15 Mironov?

16 A. Yes.

17 Q. What is Yana's phone number?

18 A. I don't know.

19 Q. Have you ever exchanged text
20 messages with Yana?

21 A. Yes.

22 Q. Do you have her phone number
23 stored in your cell phone?

24 A. Yes.

25 Q. So if you need to refresh your

1 D. Balter

2 recollection and look at your cell phone,
3 you're free to do so.

4 But what is Yana's phone number?

5 A. (Witness complies).

6 (718) 915-0288.

7 Q. So Romgo provides technician
8 services. How much does Romgo charge for
9 these services? And by that I mean how
10 much does Romgo charge the individual or
11 company that is hiring Romgo to perform
12 the technician services?

13 A. \$300 a day.

14 Q. That's a flat fee?

15 A. Yes.

16 Q. And it's \$300 per day to provide
17 one technician at one medical office?

18 A. Yes.

19 Q. Since inception has Romgo ever
20 charged any individual or company for a
21 rate other than \$300 per day to provide
22 one technician for one medical office?

23 A. No.

24 MR. SCOLLAN: I'm just going to
25 mark this as Exhibit 2.

1 D. Balter

2 [The document was hereby marked
3 as Exhibit 2 for identification, as of
4 this date.]

5 BY MR. SCOLLAN:

6 Q. I'll share my screen. If you
7 need me to zoom in or anything, just let
8 me know.

9 So I will share my screen.

10 So what's been marked as Exhibit
11 2 is a 13-page document. The first page
12 is part of a bill submitted by Elena
13 Borisovna Stybel, M.D., for patient,
14 initials SH.

15 And I can also represent that on
16 page 4 of the exhibit, which is page 4 of
17 the NF-3 form submitted by this practice,
18 it lists the provider's signature as Elena
19 Borisovna Stybel with the TIN number
20 beginning with 5-5.

21 I'm going to refer to this
22 practice as the Stybel practice.

23 Do you see that, sir?

24 MR. MESTECHKIN: For the record,
25 Garin, we see only a portion of the

1 D. Balter

2 page, maybe two-thirds of the upper
3 side of the page is visible.

4 MR. SCOLLAN: Sounds good. I
5 will zoom out and I can zoom in if
6 necessary.

7 MR. MESTECHKIN: Thank you.

8 MR. SCOLLAN: No, thank you.

9 BY MR. SCOLLAN:

10 Q. Do you see the first page of
11 Exhibit 2, sir?

12 A. Yes.

13 Q. So I'll zoom in just so we can
14 see the top half including Elena Borisovna
15 Stybel, M.D., listed on the first page as
16 the provider.

17 Do you recognize that name, sir?

18 THE INTERPRETER: This is the
19 interpreter speaking.

20 I'm so sorry, but I've noticed
21 when it is just one word, for some
22 reason I either can't hear it or it
23 gets muffled. So I will ask for a
24 repetition.

25 (Interpreter repeats question.)

1 D. Balter

2 A. Yes.

3 Q. And how do you know Dr. Stybel?

4 A. I saw her name on the assignment
5 of benefits.

6 Q. Have you ever met Dr. Stybel?

7 A. No.

8 MR. MESTECHKIN: My sincere
9 apologies. Can you give me five
10 minutes? I just need to step out for
11 five minutes and I will be right back.

12 MR. SCOLLAN: Yes. We will come
13 back in five minutes.

14 MR. MESTECHKIN: Thank you very
15 much.

16 (Whereupon, a recess was taken
17 at this time.)

18 MR. SCOLLAN: Can you just read
19 the last question and answer?

20 (Whereupon, the record was read
21 by the reporter.)

22 MR. SCOLLAN: And the question
23 before that? I'm sorry.

24 (Whereupon, the record was read
25 by the reporter.)

1 D. Balter

2 BY MR. SCOLLAN:

3 Q. Have you ever spoken to Dr.
4 Stybel?

5 A. No.

6 Q. And I believe you testified that
7 you've seen Dr. Stybel on an assignment of
8 benefits form?

9 A. Yes.

10 Q. Have you ever been in the same
11 room as Dr. Stybel?

12 A. No.

13 Q. Did Romgo provide technician
14 services for the Stybel practice?

15 A. No.

16 MR. SCOLLAN: Can you just read
17 back the question? I'm sorry.

18 (Whereupon, the record was read
19 by the reporter.)

20 BY MR. SCOLLAN:

21 Q. Was Romgo ever contacted by
22 anybody to provide technician services
23 that were billed through the Stybel
24 practice?

25 A. No.

1 D. Balter

2 Q. Were you ever given an
3 assignment of benefits form with Dr.
4 Stybel's signature on it?

5 A. Yes.

6 Q. Who gave you the assignment of
7 benefits form?

8 MR. MESTECHKIN: Objection to
9 form.

10 Are you talking about assignment
11 of benefits form that was signed by
12 Dr. Stybel?

13 MR. SCOLLAN: Correct. I'll
14 rephrase.

15 BY MR. SCOLLAN:

16 Q. Who gave you the assignment of
17 benefits form that was signed by Dr.
18 Stybel?

19 THE INTERPRETER: This is the
20 interpreter again. I'm so sorry but I
21 can't hear it.

22 A. Yana did.

23 Q. And by "Yana," you obviously
24 mean Yana Mironovich, correct?

25 A. Yes.

1 D. Balter

2 Q. How did Yana give you the
3 assignment of benefits form?

4 A. She sent it to my e-mail.

5 Q. Which one?

6 A. Dennismironov@gmail.com.

7 Q. Do you remember what she said in
8 the e-mail?

9 A. I don't remember.

10 MR. SCOLLAN: GEICO calls for
11 preservation of any e-mails exchanged
12 between Yana and Mr. Balter as well as
13 Romgo. Those communications would be
14 responsive to the subpoena that was
15 originally served on Romgo Tech
16 Service Inc.

17 MR. MESTECHKIN: To the extent
18 that our client has those same
19 e-mails, we note the request.

20 BY MR. SCOLLAN:

21 Q. Did the assignment of benefits
22 have an address on it next to Dr. Stybel's
23 signature?

24 A. No.

25 Q. What information was on the

1 D. Balter
2 assignment of benefits form other than Dr.
3 Stybel's signature?

4 A. The doctors' first and last
5 names. Then below that the address and
6 the signature on the right side.

7 MR. SCOLLAN: So I'm going to
8 share my screen. This will be Exhibit
9 3.

10 [The document was hereby marked
11 as Exhibit 3 for identification, as of
12 this date.]

13 Q. It's a 1-page document that is
14 an assignment of benefits form. On the
15 top it says Elena Borisovna Stybel and
16 date. On the bottom it says Elena
17 Borisovna Stybel and date with an address
18 underneath it and a signature next to that
19 on the bottom-right corner of the
20 assignment of benefits.

21 Do you see that, sir?

22 A. Yes.

23 Q. Does this document look similar
24 to the assignment of benefits form that
25 Yana e-mailed you?

1 D. Balter

2 A. Yes.

3 Q. Did the assignment of benefits
4 form that Yana e-mailed you have any
5 additional information on it other than
6 what is filled in on this assignment of
7 benefits form marked as Exhibit 3?

8 A. No.

9 Q. Do you recognize the address
10 3063 Brighton 8th Street, Floor 2,
11 Brooklyn, New York?

12 A. Yes.

13 Q. Whose address is that?

14 THE INTERPRETER: This is the
15 interpreter speaking. I am sorry. I
16 didn't catch it.

17 A. It's the billing address.

18 Q. Whose billing address?

19 A. Yana's.

20 Q. How long have you known Yana?

21 A. For about a year and a half.

22 Q. Do you also know her to go by
23 the name of Yana Levkovich or do you know
24 her only as Yana Mironovich?

25 MR. MESTECHKIN: Objection to

1 D. Balter

2 form.

3 You may answer.

4 A. I know her just as Yana.

5 Q. How did you meet Yana?

6 A. Yana called me and said that
7 they needed a technician for service and
8 that's how we met.

9 Q. Do you remember what medical
10 practice or healthcare practice Yana first
11 contacted you about?

12 A. I don't remember.

13 Q. Did Yana call you to ask for
14 technicians to provide services for the
15 Stybel practice?

16 MR. MESTECHKIN: Objection.

17 Counsel, are you talking about
18 the very first call?

19 MR. SCOLLAN: I'm talking in
20 general. So let's take a step back.

21 BY MR. SCOLLAN:

22 Q. Did Yana ever contact you to
23 hire Romgo to provide technicians for the
24 Stybel practice?

25 A. No.

1 D. Balter

2 Q. Do you know the name of any
3 healthcare practices that Yana called you
4 to ask for technicians for?

5 A. I don't remember.

6 Q. Do you have any documents that
7 you could refer to to figure out which
8 practices she called you about?

9 A. No.

10 MR. SCOLLAN: I'm going to mark
11 This as Exhibit 4. The Romgo
12 subpoena.

13 [The document was hereby marked
14 as Exhibit 4 for identification, as of
15 this date.]

16 BY MR. SCOLLAN:

17 Q. I will share my screen. So
18 Exhibit 4 is the subpoena issued in this
19 case by plaintiffs on Romgo Tech Service
20 dated October 12th of 2022.

21 Do you see the document?

22 A. Yes.

23 Q. And going -- do you recognize
24 the subpoena?

25 A. Yes.

1 D. Balter

2 Q. And going down to page 4 of the
3 subpoena, do you see that under "person
4 and entities at issue" it lists Elena
5 Borisovna Stybel, M.D., a sole
6 proprietorship, with the tax
7 identification number starting with 5-5?

8 A. Yes.

9 Q. Do you see also where it says
10 "Elena Borisovna Stybel, D.O."?

11 A. Yes.

12 Q. And you see where it says
13 "Evergreen & Remegone, LLC, correct?

14 A. Yes.

15 Q. Are you familiar with the
16 company known as Evergreen & Remegone,
17 LLC?

18 A. No.

19 Q. Did you say "no"?

20 A. Yes, I said "no."

21 Q. Because also within the subpoena
22 that you recognize you see on page 5 were
23 certain documents were requested relating
24 to Dr. Stybel the sole proprietorship
25 under Dr. Stybel and Evergreen & Remegone?

1 D. Balter

2 Do you see that, sir?

3 A. Yes.

4 MR. SCOLLAN: So I am going to
5 mark this as Exhibit 5. It is an
6 e-mail exchange between myself and
7 Romgotechservice@gmail.com.

8 [The document was hereby marked
9 as Exhibit 5 for identification, as of
10 this date.]

11 BY MR. SCOLLAN:

12 Q. Do you see that, sir?

13 A. Yes.

14 Q. And on December 16, 2022, I
15 drafted an e-mail to you as a follow-up to
16 a phone call on a meet and confer that we
17 had on the subpoena which was marked as
18 Exhibit 4.

19 Do you see that e-mail that I
20 sent, sir?

21 A. Yes.

22 Q. And then it says in an e-mail
23 dated Monday, December 19, 2022, it says:
24 "Good afternoon, Garin Scollan. Thank you
25 for your e-mail" and provided the

1 D. Balter

2 information. "As discussed over the phone
3 we have checked for e-mails and text
4 messages and we can confirm that we do not
5 store any communications from the past
6 year as requested. Please find attached
7 the 1099 and bank statements with check
8 images as proof of payment for the tech
9 services. Please feel free to contact me
10 if you have any questions. Very truly
11 yours, Dennis Balter, Romgo Tech Service
12 Inc."

13 Did you send that e-mail?

14 A. Yes.

15 Q. And you did so after reviewing
16 your records to respond to the subpoena
17 that was served on Romgo Tech relating to
18 Dr. Stybel, her practice and Evergreen &
19 Remegone, correct?

20 A. (Inaudible).

21 Q. Speak up, please.

22 A. Yes.

23 MR. SCOLLAN: So I'm marking as
24 Exhibit 6, a 9-page document that
25 includes checks.

1 D. Balter

2 [The document was hereby marked
3 as Exhibit 6 for identification, as of
4 this date.]

5 BY MR. SCOLLAN:

6 Q. I will zoom in on a check on
7 page 1. The first check is from a company
8 called Evergreen & Remegone, LLC, in the
9 amount of \$8,700 issued to Romgo Tech
10 Service.

11 Do you see that, sir?

12 A. Yes.

13 Q. Speak up and say yes or no,
14 please.

15 A. Yes.

16 Q. Does Romgo have a bank account
17 at Investors Bank?

18 A. Yes.

19 Q. Is that your handwriting in the
20 endorsement line of this check?

21 A. Yes.

22 Q. Why did Evergreen & Remegone,
23 LLC, issue this check to Romgo Tech
24 Service?

25 A. For the service that I had

1 D. Balter

2 provided.

3 Q. What service?

4 A. Shockwave test.

5 Q. Who works for Evergreen &
6 Remegone, LLC?

7 A. I don't know.

8 Q. Do you know who owns the
9 company?

10 A. I don't know.

11 Q. Do you know if it's a healthcare
12 practice?

13 A. I don't know.

14 Q. You said that this check was
15 paid to Evergreen -- paid from Evergreen &
16 Remegone, LLC, to Romgo in exchange for
17 shockwave tests; is that correct?

18 A. Yes.

19 Q. Was this check issued by
20 Evergreen & Remegone, LLC, in exchange for
21 Romgo providing technicians for a specific
22 healthcare practice?

23 A. I don't know.

24 Q. Who would know the answer to
25 that question?

1 D. Balter

2 A. Could you rephrase the question,
3 please?

4 Q. Who would know the answer to the
5 question of which healthcare practice did
6 Romgo Tech provide technicians to in
7 exchange for this check from Evergreen &
8 Remegone, LLC?

9 THE INTERPRETER: I will request
10 for repetition, I'm so sorry. I
11 didn't hear the very beginning.

12 A. I got it from billing.

13 Q. What does that mean?

14 A. Well, you asked who provided the
15 check, correct? And I answered that Yana
16 produced this check from the Billing
17 Department.

18 Q. Okay. Did Yana give you this
19 check from Evergreen & Remegone, LLC, that
20 was issued to Romgo Tech Service?

21 A. Yes.

22 Q. How did she do that, did she
23 hand it to you?

24 A. Yes.

25 Q. Where were you when she handed

1 D. Balter

2 you the check?

3 A. At Yana's office.

4 Q. On Brighton 8th Street?

5 A. Yes.

6 Q. Did she tell you what the check
7 was for?

8 A. For the work.

9 Q. Did she say anything else other
10 than this check is "for the work"?

11 A. No.

12 Q. There's a check on page 2 issued
13 from Evergreen & Remegone to Romgo Tech
14 Service. Check number 1023 in the amount
15 of \$3,450. Do you see that?

16 A. Yes.

17 Q. Did Yana hand you this check?

18 A. Yes.

19 Q. Did she tell you what it was
20 for?

21 A. For the service, for the work
22 provided.

23 Q. For technician services?

24 A. Yes.

25 Q. Did she tell you for what

1 D. Balter

2 medical practice?

3 A. No.

4 Q. There's another check on page 2,
5 check number 1025 from Evergreen &
6 Remegone, LLC, to Romgo Tech Service in
7 the amount of \$3,600.

8 Did you deposit this check into
9 Romgo Tech's bank account?

10 A. Yes.

11 Q. Did Yana hand you this check at
12 her Brighton 8th Street office?

13 A. Yes.

14 Q. Did she tell you what it was
15 for?

16 A. For the services.

17 Q. For technician services?

18 A. Yes.

19 Q. Did Yana ever pay you for
20 technician services through any other
21 companies?

22 A. I don't remember.

23 Q. Here's another check on page 3
24 from Evergreen & Remegone to Romgo in the
25 amount of \$2,050, check number 1045.

1 D. Balter

2 Did Yana hand you this check?

3 A. Yes.

4 Q. Did she hand it to you at the
5 Brighton 8th Street office?

6 A. Yes.

7 Q. Did she tell you it was for
8 technician services?

9 A. Yes.

10 Q. Did she tell you for what
11 medical practice this check was paid on
12 behalf of?

13 A. No.

14 Q. Page 4, check dated September, I
15 believe, 14th or 19th of 2021. Check
16 number 1039 from Evergreen & Remegone,
17 LLC, to Romgo in the amount of \$2,850.

18 Did Yana physically hand you
19 this check at her Brighton 8th Street
20 office?

21 A. Yes.

22 Q. Did she tell you it was for
23 technician services?

24 A. Yes.

25 Q. Did she tell you for which

1 D. Balter

2 medical practice this check was being
3 issued on behalf of?

4 A. No.

5 Q. Did you ever ask Yana what kind
6 of company Evergreen & Remegone was?

7 A. No.

8 Q. Did you ever ask Yana on which
9 medical practice these checks were being
10 issued on behalf of?

11 A. No.

12 Q. Why not?

13 A. I don't know.

14 Q. Were you curious?

15 A. No.

16 Q. Are you curious now?

17 A. Yes.

18 Q. Is it fair to say, Mr. Balter,
19 that you provide technician services and
20 you want to get paid for them, right?

21 A. Yes.

22 Q. So how do you go about making
23 sure that Yana pays you for all the
24 technician services that you provided for
25 her?

1 D. Balter

2 A. I would bring her all the
3 reports from the offices. She would
4 calculate the number of days and then she
5 would issue checks.

6 Q. What do the reports look like?

7 A. So those would be 4 pages that
8 the pages would fill out and sign and then
9 there was an initial report from the
10 office.

11 Q. What do you mean an initial
12 report?

13 A. I mean the doctor's initial
14 report from their first appointment with
15 the patient.

16 Q. Did Romgo's technicians ever
17 know the name of the medical practice that
18 they were performing these technician
19 services on behalf of?

20 A. Could you rephrase the question,
21 please?

22 MR. SCOLLAN: Could you please
23 repeat the question, Iris?

24 (Whereupon, the record was read
25 by the reporter.)

1 D. Balter

2 MR. MESTECKIN: Objection to
3 form. If the witness understands the
4 question, he may answer.

5 BY MR. SCOLLAN:

6 Q. You can answer.

7 A. No.

8 Q. Did you as the manager of Romgo
9 ever do anything to find out the names of
10 the healthcare practices that Romgo was
11 providing technician services on behalf
12 of?

13 A. No.

14 Q. Why not?

15 A. I didn't need it.

16 Q. Is it because you didn't want to
17 know?

18 MR. MESTECKIN: Objection.
19 You may answer.

20 A. Yes.

21 Q. Going down to page 5 of the
22 exhibit, it's a check issued from
23 Evergreen & Remegone dated a date in
24 September of 2021, check number 1051 in
25 the amount of \$3,000.

1 D. Balter

2 Did Yana hand you this check
3 that was issued from Evergreen & Remegone
4 to Romgo?

5 A. Yes.

6 Q. Did she do so at her Brighton
7 8th Street office?

8 A. Yes.

9 Q. Did Yana tell you that the check
10 was being issued for technician services?

11 A. Yes.

12 Q. Did Romgo maintain copies of any
13 of the reports or the documents that they
14 handed Yana?

15 A. No.

16 Q. Here's another check from
17 Evergreen to Romgo Tech Service in the
18 amount of \$3,100 check number 1049.

19 Did Yana hand you this check at
20 the Brighton 8th Street office?

21 A. Yes.

22 Q. Did she tell you that it was for
23 technician services?

24 A. Yes.

25 Q. There's also a check on page 6

1 D. Balter

2 from Evergreen & Remegone, LLC, to Romgo
3 in the amount of \$2,750 check number 1056.

4 Did Yana hand you this check at
5 the one at the Brighton 8th Street office?

6 A. Yes.

7 Q. And she told you it was for
8 technician services, right?

9 A. Yes.

10 Q. Page 7, check in the amount of
11 \$3,050 from Evergreen & Remegone, LLC, to
12 Romgo.

13 Did Yana hand you this check at
14 the Brighton 8th Street office?

15 A. Yes.

16 Q. Did she tell you it was for
17 technician services?

18 A. Yes.

19 Q. There's a check on page 8, check
20 number 1066 from Evergreen & Remegone,
21 LLC, to Romgo in the amount of \$3,350.

22 Did Yana hand you this check at
23 the Brighton 8th Street office?

24 A. Yes.

25 Q. Did Yana tell you this check was

1 D. Balter

2 payment for Romgo providing technician
3 services?

4 A. Yes.

5 Q. There's a check on page 9, check
6 number 1073 in the amount of \$3,300 from
7 Evergreen & Remegone to Romgo.

8 Did Yana hand you this check at
9 the Brighton 8th Street office?

10 A. Yes.

11 Q. Did Yana tell you that this
12 check was being issued from Evergreen to
13 Romgo in exchange for Romgo providing
14 technician services?

15 A. Yes.

16 Q. And that's because Yana told you
17 that each of the checks that we've gone
18 through in this Exhibit that were issued
19 from Evergreen & Remegone, LLC, to Romgo
20 was payment in exchange for Romgo
21 providing technician services, correct?

22 MR. MESTECKIN: Objection to
23 form, but if the witness understands
24 the question, he may answer.

25 A. Yes.

1 D. Balter

2 Q. Who does Yana work for?

3 A. I don't know.

4 Q. Do you know anybody else who
5 works at the Brighton 8th Street office
6 other than Yana?

7 A. No.

8 Q. Do you know Alex Khait,
9 K-H-A-I-T?

10 A. No.

11 MR. SCOLLAN: Let's take a
12 ten-minute break.

13 MR. MESTECHKIN: Sure. Thank
14 you.

15 (Whereupon, a recess was taken
16 at this time.)

17 MR. SCOLLAN: Could you read the
18 last question?

19 (Whereupon, the record was read
20 by the reporter.)

21 BY MR. SCOLLAN:

22 Q. Did Yana e-mail you any other
23 assignment of benefit forms other than the
24 assignment of benefit form for Dr. Stybel?

25 A. No.

1 D. Balter

2 Q. Did Yana ever tell you the name
3 of the healthcare practices that Romgo was
4 providing technician services for?

5 A. No.

6 Q. Did Yana ask you to provide
7 technicians for specific clinics?

8 A. Yes.

9 Q. Do you know any of the locations
10 where Yana asked Romgo techs to go to?

11 A. I don't remember.

12 Q. Do you know if Romgo's
13 technicians were providing services for
14 multiple healthcare providers or a single
15 location on the same day?

16 A. No.

17 Q. If you had to find out the
18 answer of which healthcare practice Romgo
19 was providing technician services for,
20 would you ask Yana?

21 A. Yes.

22 Q. So, previously, you testified
23 that Romgo charges \$300 per day to provide
24 one technician for one clinic location,
25 correct?

1 D. Balter

2 A. Yes.

3 Q. Did Yana ever reimburse Romgo
4 for anything other than providing the
5 technician?

6 A. No.

7 Q. Because going back to Exhibit 6,
8 it's page 8 of Exhibit 6. This is a check
9 from Evergreen to Romgo for \$3,350. So
10 based on simple math that isn't divisible
11 by 300 in terms of a clean number. It
12 would represent more than eleven days of
13 service.

14 Specifically when you do the
15 math \$3,350 divided by 300 is 11.166666.

16 So do you know whether or not
17 this check was issued to reimburse Romgo
18 for something in addition to providing
19 techs to Yana?

20 A. Sometimes we would get checks
21 once a week. Sometimes every two weeks.
22 And sometimes a technician would go to an
23 office and then they would be told that no
24 services were needed. So for those days
25 Yana would pay a \$100 or \$150.

1 D. Balter

2 Q. Would Yana contact you to tell
3 you when you could stop by the Brighton
4 8th Street office to pick up the checks?

5 A. Yes.

6 Q. Did she contact you over the
7 phone?

8 A. Yes.

9 Q. On which phone number of yours
10 would she contact?

11 A. (646) 420-7283.

12 Q. You mentioned that the
13 technicians for Romgo fill out four
14 different pages at the clinic locations,
15 correct?

16 A. Yes.

17 Q. Can you describe what these
18 pages are?

19 A. So the first page would you be
20 an assignment benefits. The next page I
21 don't remember. The third page would
22 indicate all the body parts that patient
23 was having pain in. And the fourth page
24 would include the test results.

25 Q. Were any of these pages

1 D. Balter

2 created -- let me take a step back.

3 Were any of these forms created
4 by Romgo?

5 A. No.

6 Q. Were all of the forms that
7 Romgo's technicians used at the clinic
8 locations provided by the front desk at
9 the clinic?

10 A. No.

11 Q. So where did the technicians get
12 the forms from?

13 A. Yana gave those forms. I made
14 copies of those and gave them to the
15 technicians.

16 Q. Did Yana hand you the forms to
17 use at the Brighton 8th Street office?

18 A. Yes.

19 Q. And then after that you made
20 your own copies of the forms, correct?

21 A. Yes.

22 Q. And then you gave the forms to
23 Romgo's technicians, correct?

24 A. Yes.

25 Q. When Romgo's technician was done

1 D. Balter

2 at a clinic for the day what would they do
3 with the forms?

4 A. They would put them in an
5 envelope and put the name of the office on
6 the envelope.

7 Q. Who would they gave the envelope
8 to?

9 A. To me.

10 Q. And then you would then bring
11 the envelope with the forms in it to Yana,
12 correct?

13 A. Yes.

14 Q. You mentioned before that part
15 of your duties as manager of Romgo is to
16 find technicians, correct?

17 A. Yes.

18 Q. How do you do that?

19 A. I would usually do it through
20 friends or friends of friends.

21 Q. Do you know the names of any of
22 the individuals who have helped you find
23 technicians that provided services through
24 Romgo?

25 A. I don't remember.

1 D. Balter

2 Q. If you had to find a technician
3 right now and you had to call somebody,
4 who would you call?

5 A. I would call one of the
6 technicians who has already worked for me
7 and ask him if he knew of anyone who would
8 want to work for me, too.

9 Q. Would you call anyone else?

10 A. No.

11 Q. Can you name all of the
12 technicians that have provided services to
13 Romgo since 2021?

14 A. Yes.

15 Q. Please do so.

16 A. Milana, Artem, Gena, Paul, and
17 Sasha.

18 Q. Is Milana's last name Levitan?

19 A. Yes.

20 Q. Is Paul's last name Royzengurt?

21 A. Yes.

22 Q. Did you say Artem, A-R-T-E-M?

23 A. Yes.

24 Q. What's Artem's last name?

25 A. Chebuchenko.

1 D. Balter

2 MR. MESTECHKIN: We will try to
3 spell it in the chart but we may need
4 to confirm it later.

5 MR. SCOLLAN: Sure.

6 MR. MESTECHKIN: We will have to
7 confirm it counsel, but we're not sure
8 yet.

9 MR. SCOLLAN: That's fine.

10 BY MR. SCOLLAN:

11 Q. Is it Genna, G-E-N-N-A?

12 A. I think so or maybe with just
13 one N.

14 Q. Do you know Gena's last name?

15 A. No.

16 Q. Do you know Sasha's last name?

17 A. No.

18 Q. Has Romgo issued a 1099 to
19 Milana, Artem, Paul, Gena and Sasha?

20 A. We give it to Milana and Paul.

21 Q. How is Artem compensated for his
22 work through Romgo?

23 A. He worked for his company. For
24 his company.

25 Q. What's it called?

1 D. Balter

2 A. Metropolitan.

3 Q. Did he say "Metropolitan"?

4 A. Yes.

5 Q. And did you write a check from
6 Romgo to Metropolitan to pay Artem for the
7 services that Artem provided through
8 Romgo?

9 A. Yes. Yes, sorry.

10 Q. Do you know an Artem Smirnov,
11 S-M-I-R-N-O-V?

12 A. Yes.

13 Q. Has he provided any services
14 through Romgo?

15 A. Yes.

16 Q. How did you compensate Artem for
17 his work through -- Artem Smirnov for his
18 work through Romgo?

19 A. I would issue a check in his
20 company name.

21 Q. Is his company called Trydat,
22 T-R-Y-D-A-T, Inc.?

23 A. Yes.

24 Q. Did Romgo issue a 1099 to Artem
25 Smirnov?

1 D. Balter

2 A. No.

3 Q. Did Romgo issue a 1099 to
4 Trydat, Inc.?

5 A. No.

6 Q. Did Romgo issue a 1099 to Gena?

7 A. No.

8 Q. Did Romgo issue a 1099 to Sasha?

9 A. No.

10 Q. How was Gena compensated for her
11 work through Romgo?

12 THE INTERPRETER: It is the
13 interpreter speaking. Gena is a male
14 just to clarify.

15 MR. SCOLLAN: I'm sorry. I
16 apologize.

17 BY MR. SCOLLAN:

18 Q. How was Gena compensated for his
19 work through Romgo?

20 A. I would write out a check in his
21 company's name.

22 Q. What company?

23 A. I don't remember.

24 Q. Is it EZ Auto Hauling, Inc.?

25 A. Yes, I think so.

1 D. Balter

2 Q. How would Sasha be compensated
3 for her work through Romgo?

4 A. I would write out a check in the
5 company's name as well.

6 Q. Do you know the name of the
7 company?

8 A. I don't remember.

9 THE INTERPRETER: This is the
10 interpreter speaking again. I'm
11 sorry. I'm not sure if this is
12 important or not, but I'm not sure if
13 Sasha is a female because it could be
14 both a male or a female.

15 MR. SCOLLAN: I had the same
16 thought.

17 BY MR. SCOLLAN:

18 Q. Is Sasha a male or female?

19 A. Male.

20 Q. So Sasha was issued a check from
21 Romgo to his company to compensate Sasha
22 for his work through Romgo, correct?

23 A. Yes.

24 MR. MESTECHKIN: My apologies.

25 Note to the interpreter, I believe

1 D. Balter

2 that counsel was asking whether
3 compensation was issued to Sasha's
4 company.

5 THE INTERPRETER: And what did I
6 state? I'm sorry.

7 MR. MESTECHKIN: I believe the
8 translation did not specify that the
9 check was issued to Sasha's company.
10 Would it be possible for the court
11 reporter to repeat the question?

12 MR. SCOLLAN: Sure.

13 (Whereupon, the record was read
14 by the reporter.)

15 A. Yes.

16 Q. Regardless of who the technician
17 is, is it true that the only way that
18 Romgo compensates its technicians is
19 either through issuing a check from
20 Romgo's bank account to the individual
21 themselves or to the individual's company?

22 MR. MESTECHKIN: Objection to
23 form. If witness understands the
24 question, he may answer.

25 A. Yes.

1 D. Balter

2 Q. Does Romgo pay its technicians
3 through any other bank accounts other than
4 Romgo's?

5 A. No.

6 Q. You also mentioned that you
7 teach technicians. Did you teach any of
8 the technicians that we've discussed so
9 far how to provide the technical services
10 through Romgo?

11 A. Yes.

12 Q. Which ones?

13 A. To all of them.

14 Q. Did you provide each of them
15 with the same training?

16 A. Yes.

17 Q. Can you just describe what that
18 training was?

19 A. Yes. They would come to my
20 office. I would show them how to do the
21 test. I would show them how to adjust the
22 settings on the machine, and what body
23 parts to do the test on. And they would
24 watch me and sometimes do the test
25 themselves as well.

1 D. Balter

2 They wouldn't come to my office.

3 They would come to the office where I
4 worked on that particular day.

5 Q. And what office would that be?

6 A. It was a medical office but I
7 don't remember the location.

8 Q. Would this be a medical office
9 that was a multidisciplinary clinic that
10 provided services to No-Fault patients?

11 A. Yes.

12 Q. When was the last time you
13 personally performed technician services
14 on behalf of Romgo?

15 A. I don't remember.

16 Q. The training that you just
17 described, would you provide that training
18 once to each technician?

19 A. Yes, if they understood how to
20 do everything properly.

21 Q. Did you ever have to give the
22 training more than once to any of the
23 technicians?

24 A. Yes.

25 Q. Do you remember who?

1 D. Balter

2 A. I don't remember.

3 Q. Once you completed the training
4 of the technician at the clinic did you
5 leave the clinic?

6 A. I would stay to finish my
7 workday and the person who was being
8 trained would leave if they had understood
9 everything.

10 Q. I understand.

11 So you were at the medical
12 office providing services through your own
13 tech company, correct?

14 A. Yes.

15 Q. Did Yana tell Romgo's
16 technicians what clinic locations they had
17 to go to on a specific day?

18 A. No. Yana would provide me with
19 a schedule and I would tell the
20 technicians where to go.

21 Q. Did she e-mail you the schedule?

22 A. No.

23 Q. How did she give you the
24 schedule?

25 A. She had a board with the

1 D. Balter
2 schedule for the whole month at her office
3 and when I went to the office to drop off
4 the reports, I would see the schedule on
5 the board and I would take a picture of it
6 or sometimes she would text it to me via
7 text message.

8 Q. And by "the office," you mean
9 the office at Brighton 8th Street,
10 correct?

11 A. Yes.

12 Q. Did Romgo receive a 1099 for the
13 work it provided on behalf of Evergreen?

14 A. No.

15 Q. Did Romgo receive a 1099
16 relating to the payments that it received
17 from Evergreen?

18 A. No.

19 Q. Does Romgo have an accountant?

20 MR. MESTECKIN: Counsel, can
21 you repeat the question? I don't
22 think translation was accurate.

23 MR. SCOLLAN: Sure.

24 BY MR. SCOLLAN:

25 Q. This might help.

1 D. Balter

2 Has Romgo ever filed tax
3 returns?

4 A. Yes, I did file taxes.

5 Q. And did an accountant prepare
6 those tax returns for Romgo?

7 A. Yes.

8 Q. Who?

9 A. Maaya Schneider.

10 Q. Do you know where she's located?

11 A. She is on Brighton 11th. I
12 don't remember the exact address.

13 Q. Are you familiar with a company
14 called New York Billing and Processing
15 Corp?

16 A. No.

17 MR. SCOLLAN: Let's go off the
18 record.

19 (Whereupon, a discussion was
20 held off the record.)

21 MR. SCOLLAN: Back on the
22 record.

23 BY MR. SCOLLAN:

24 Q. Do Romgo's technicians have any
25 certifications?

1 D. Balter

2 A. No.

3 Q. Do you know if Yana works for
4 any companies?

5 A. I don't know.

6 Q. Do you remember the last time
7 you spoke to Yana on the phone?

8 A. I don't remember.

9 Q. Do you remember the last time
10 you exchanged text messages with her?

11 A. I don't remember.

12 Q. Was there a time that Yana
13 stopped calling you for technician
14 services?

15 A. Yes.

16 Q. Do you remember when that was?

17 A. I don't remember.

18 Q. Did you ever call Yana and ask
19 her why she stopped needing technicians?

20 A. No.

21 MR. SCOLLAN: This will be --
22 I'll mark this as Exhibit 7. This is
23 a photo.

24 [The photograph was hereby
25 marked as Exhibit 7 for

1 D. Balter

2 identification, as of this date.]

3 BY MR. SCOLLAN:

4 Q. Do you know who this is?

5 A. Yes.

6 Q. Who is it?

7 A. Yana.

8 Q. The same Yana we've been talking
9 about today?

10 A. Yes.

11 Q. The same Yana that handed you
12 the checks from Evergreen & Remegone, LLC
13 to Romgo?

14 A. Yes.

15 MR. SCOLLAN: So I'll mark this
16 as Exhibit 8, it's a 16-page document.

17 [The document was hereby marked
18 as Exhibit 8 for identification, as of
19 this date.]

20 MR. SCOLLAN: I can represent
21 that these are bank records that Romgo
22 provided, specifically Mr. Balter
23 provided to me via e-mail pursuant to
24 the subpoena that was served on Romgo
25 Tech Service in this case. The

1 D. Balter

2 specific bank statement is for August
3 of 2021.

4 BY MR. SCOLLAN:

5 Q. Do you see that first page, sir?

6 A. Yes.

7 Q. And you recognize this bank
8 account obviously?

9 A. Yes.

10 Q. Is this the only bank account in
11 Romgo's name?

12 A. Yes.

13 Q. And this has been the only bank
14 account Romgo has had since inception?

15 A. Yes.

16 Q. The address on the first page,
17 do you live in that apartment?

18 A. No.

19 Q. What is that address?

20 A. That's my wife's parents
21 address.

22 Q. Why would you put that address
23 as the address on Romgo's bank account?

24 A. My wife indicated that address.

25 Q. Did you ask her why?

1 D. Balter

2 A. No.

3 Q. Have your in-laws ever provided
4 technician services for Romgo?

5 A. No.

6 Q. Have they ever done anything for
7 Romgo?

8 A. No.

9 Q. So zooming in, this is page 7 of
10 the PDF part of the bank records. It's a
11 check from Romgo to a company called
12 Megapolis, Inc., in the amount of \$1,000.

13 Do you see that, sir?

14 A. Yes.

15 Q. Who signed the check?

16 A. My wife did.

17 Q. Why was this check issued from
18 Romgo to Megapolis?

19 A. For the service that Megapolis
20 had provided.

21 Q. Were these technician services?

22 A. Yes.

23 Q. And this was for technician
24 services provided through Romgo, correct?

25 A. Yes.

1 D. Balter

2 Q. Do you know who owns Megapolis?

3 A. No.

4 Q. Are you familiar with the name
5 Artem Chubchenko?

6 A. Yes.

7 Q. Who is that?

8 A. A technician.

9 Q. A technician who provided
10 services through Romgo?

11 A. Yes.

12 Q. Do you know if Megapolis has an
13 office?

14 A. I don't know.

15 Q. Who actually filled out this
16 check because it's typed? Do you see
17 that?

18 A. I filled it out.

19 Q. And how did you know to issue a
20 check for \$1,000 to Megapolis?

21 A. Because the technician worked
22 five days and I paid them \$200 for each
23 day.

24 Q. So this check -- how did you
25 know to issue the check specifically to

1 D. Balter

2 Megapolis?

3 A. Because Artem, the technician,
4 brought me five reports, which means that
5 I have to multiple five by 200 and then
6 I'll get the \$1,000. Each report is \$200.

7 Q. Well, let's take a step back.
8 Did you pay Artem \$200 per day
9 or \$200 per report?

10 A. \$200 per day. And I meant
11 reports, reports that were filed per day.
12 There were multiple reports that were
13 filed per day.

14 Q. So regardless of how many
15 reports Artem generated, he was only paid
16 \$200 per day, correct?

17 A. Yes.

18 Q. Was Artem's rate always \$200 per
19 day?

20 A. Yes.

21 Q. There's a check here for \$1,050
22 from Romgo to Megapolis. Why did Romgo
23 pay Megapolis an extra \$50?

24 A. Most likely because there was no
25 parking at the office where he worked so

1 D. Balter

2 he had to pay for parking.

3 Q. All of the checks that Romgo
4 issued from its bank account to the
5 technicians, were those checks created by
6 you?

7 A. Yes.

8 Q. There's a check here on the same
9 page 7 of the exhibit from Romgo to Paul
10 Royzengurt for \$800.

11 Is Mr. Royzengurt's rate also
12 \$200 per day?

13 A. Yes.

14 Q. There's a check here on page 7
15 from Romgo to IB Service Inc in the amount
16 of \$800.

17 Was this check issued to pay for
18 technician services that were provided
19 through Romgo?

20 A. Yes.

21 Q. Do you remember which
22 technician?

23 A. It was Sasha.

24 Q. I can represent to you that I
25 believe the incorporator listed on the

1 D. Balter

2 Certificate of Incorporation for IB

3 Service is a person named Iryna Borovyk.

4 Do you recognize the name Iryna
5 Borovyk?

6 A. No.

7 Q. Do you know anyone associated
8 with IB Service other than Sasha?

9 A. No.

10 Q. What was Sasha's rate?

11 A. Same, \$200 a day.

12 Q. Going down to page 8, there's a
13 check issued from Romgo Tech Service to
14 New York Step Inn. Who is the owner of
15 New York Step Inn?

16 A. I don't know.

17 Q. Do you know who owns IB Service,
18 Inc.?

19 A. You've just told me.

20 Q. Do you think that person owns IB
21 Service, Inc.?

22 A. I don't know.

23 Q. Have you ever communicated in
24 any way with a person named Iryna Borovyk?

25 A. No.

1 D. Balter

2 Q. Do you know if IB Service has an
3 office?

4 A. No.

5 Q. Does IB Service have a website?

6 A. I don't know.

7 Q. Does IB Service have a phone
8 number?

9 A. I don't know.

10 Q. Does Megapolis have a website or
11 a phone number?

12 A. I don't know.

13 Q. Do you know if New York Step Inn
14 has an office?

15 A. I don't know.

16 Q. Does New York Step Inn have a
17 website?

18 A. I don't know.

19 Q. Does New York Step Inn have a
20 phone number?

21 A. I don't know.

22 Q. Does EZ Auto Hauling, Inc. have
23 an office, website or phone number?

24 A. I don't know.

25 Q. Why did Romgo issue this check

1 D. Balter

2 to New York Step Inn?

3 A. For technician services that
4 they have provided.

5 Q. Do you know the name of the
6 technician that New York Step Inn provided
7 to Romgo?

8 A. I don't remember.

9 Q. Whose handwriting is on this
10 check from Romgo to New York Step Inn in
11 the amount of \$800?

12 A. My wife's.

13 Q. Is anyone's handwriting on this
14 check other than your wife's?

15 A. No.

16 Q. Did you tell your wife what
17 information to fill out on this check?

18 A. Yes.

19 Q. And I forget, I apologize. Who
20 is the individual who is associated with
21 EZ Auto Hauling, Inc.?

22 A. I think Gena.

23 Q. What was Gena's rate per day?

24 A. \$200.

25 Q. Regardless of the name of the

1 D. Balter

2 technician that provided services through
3 Romgo, were they all paid \$200 per day?

4 A. Yes.

5 Q. Has Romgo ever paid a company or
6 an individual at a rate higher than \$200
7 per day per technician?

8 A. Yes.

9 Q. What company was paid higher
10 than \$200 per day or what individual was
11 paid more than \$200 per day?

12 A. Trydat.

13 Q. And why was Trydat paid at a
14 higher rate?

15 A. Because they helped me once when
16 my technicians are on vacation, they
17 provided three or four technicians and I
18 paid them the rate of \$250. I don't
19 remember exactly.

20 Q. So when you say at one point you
21 compensated Trydat at a rate of \$250 per
22 day per technician -- let's take a step
23 back.

24 When you say \$250, do you mean
25 that at some point you paid Trydat \$250

1 D. Balter
2 per day per technician?

3 A. Yes.

4 MR. SCOLLAN: Did he answer?

5 A. I said "yes."

6 Q. Did you ever compensate Trydat
7 at a rate other than \$250 per day per
8 technician?

9 A. I don't remember.

10 Q. What medical practice received
11 technician services related to the payment
12 from this Romgo check issued to Megapolis
13 dated July 26th of 2021?

14 THE INTERPRETER: This is the
15 interpreter speaking. Could you
16 repeat that, please?

17 MR. SCOLLAN: That's fine. I
18 admit it was a little confusing.

19 BY MR. SCOLLAN:

20 Q. Let's take a step back.

21 This check issued from Romgo to
22 Megapolis in the amount of \$1,000 dated
23 July 26th of 2021, do you see that?

24 A. Yes.

25 Q. For what medical practice did

1 D. Balter

2 Megapolis or its technicians provide
3 services on behalf of in exchange of this
4 check?

5 A. I don't remember.

6 Q. Do you know the name of any
7 medical practice that IB Service provided
8 services for in exchange for payment from
9 Romgo?

10 A. I don't remember.

11 Q. Do you know the name of any
12 healthcare practice that Megapolis
13 performed technician services for in
14 exchange for payments from Romgo?

15 A. No, I don't remember.

16 Q. Do you know the name of any
17 healthcare practice that New York Step Inn
18 performed technician services for in
19 exchange for payments from Romgo?

20 A. I don't remember.

21 Q. Do you know the name of any
22 healthcare practice that Trydat performed
23 technician services for in exchange for
24 payments from Romgo?

25 A. I don't remember.

1 D. Balter

2 Q. Do you know the name of any
3 healthcare practice that EZ Auto Hauling,
4 Inc., performed technician services for in
5 exchange for payments from Romgo?

6 A. I don't remember.

7 Q. Do you have any documents that
8 list the healthcare practices that
9 received technician services in exchange
10 for the payments that Romgo issued to
11 these outside companies?

12 A. No.

13 Q. This check on page 8 issued from
14 Romgo to an individual named Marina
15 Levkovich in the amount of \$400, check
16 number 1066, do you see that?

17 A. Yes.

18 Q. Who is Marina Levkovich?

19 A. I don't remember.

20 Q. Did she provide technician
21 services through Romgo?

22 A. I don't remember.

23 Q. Well, you see that the memo line
24 says "tech," correct?

25 A. Yes.

1 D. Balter

2 Q. Does that indicate to you that
3 Marina Levkovich provided technician
4 services through Romgo?

5 A. Most likely, yes, but only for a
6 day or two and that is why I don't
7 remember.

8 MR. SCOLLAN: So I'm just
9 marking as Exhibit 9 a 20-page PDF
10 that makes up additional bank records
11 provided by Romgo in response to the
12 subpoena that Romgo was served with in
13 this case.

14 [The document was hereby marked
15 as Exhibit 9 for identification, as of
16 this date.]

17 BY MR. SCOLLAN:

18 Q. Going down to page 6 of the
19 exhibit, do you see these two checks
20 issued from Romgo to ML US Tech, Inc.?

21 A. Yes.

22 Q. Who owns ML US Tech, Inc.?

23 A. I don't remember.

24 Q. Does ML US Tech, Inc., have an
25 office?

1 D. Balter

2 A. No.

3 Q. Does ML US Tech, Inc., have any
4 employees?

5 A. I don't know.

6 Q. Does ML US Tech, Inc., have a
7 website?

8 A. I don't know.

9 Q. Does ML US Tech, Inc., have a
10 phone number?

11 A. I don't know.

12 Q. Did your wife fill out this
13 check?

14 A. Yes.

15 Q. Why?

16 A. Because it's a handwritten
17 check. The other checks were done through
18 an app.

19 Q. Was this check issued by Romgo
20 to pay for technician services?

21 A. Yes.

22 Q. Were all of the checks issued by
23 Romgo to Megapolis, Inc., to pay for
24 technician services?

25 A. Yes.

1 D. Balter

2 Q. Were all the checks issued by
3 Romgo to IB Service, Inc., in exchange for
4 IB Service, Inc., providing technician
5 services?

6 A. Yes.

7 Q. Were all of the checks issued by
8 Romgo to New York Step Inn in exchange for
9 New York Step Inn providing technician
10 services through Romgo?

11 A. Yes.

12 Q. Were all the checks issued from
13 Romgo to Trydat, Inc., in exchange for
14 Trydat, Inc., providing technician
15 services through Romgo?

16 A. Yes.

17 Q. Were all the checks issued by
18 Romgo to EZ Auto Hauling, Inc., in
19 exchange for EZ Auto Hauling, Inc.,
20 providing technician services through
21 Romgo?

22 A. Yes.

23 Q. Were all the checks issued by
24 Romgo to ML US Tech, Inc., in exchange for
25 ML US Tech, Inc., providing technician

1 D. Balter
2 services through Romgo?

3 A. Yes.

4 Q. How did you know that Romgo had
5 to issue a check to ML US Tech, Inc., for
6 certain technician services?

7 A. Based on reports, depending on
8 how many reports I got, I knew what the
9 amount on the check should be.

10 Q. I understand how you know the
11 amount. I'm asking you how do you know to
12 issue the checks specifically to ML US
13 Tech, Inc.?

14 A. Because the technician worked
15 for me provided the name of the company
16 but I just don't remember the name of the
17 technician.

18 Q. So is it fair to say that for
19 any check that Romgo issued to an outside
20 company in exchange for technician
21 services, you would have to personally be
22 told by the technician to write it to that
23 company, correct?

24 A. Yes, that is correct.

25 Q. Because it's fair to say, sir,

1 D. Balter

2 that you know nothing about any of these
3 companies other than you're issuing
4 payments to them in exchange for
5 technician services, correct?

6 A. Yes.

7 Q. This is page 14 of the exhibit.
8 This is a check dated October 20th of 2021
9 in the amount of \$2000, check number 1090
10 from Romgo to Beta Trading Corp.

11 Who owns Beta Trading Corp.?

12 THE INTERPRETER: This is the
13 interpreter speaking. I couldn't hear
14 the first name.

15 A. Iryna Balter.

16 Q. Is Iryna Balter related to you?

17 A. Yes.

18 Q. How?

19 A. She's my mother.

20 Q. Does your mother provide
21 technician services through Romgo?

22 A. No.

23 Q. Why did Romgo issue this check
24 to Beta Trading Corp.?

25 A. I don't remember.

1 D. Balter

2 MR. SCOLLAN: Let's take five
3 minutes. I think we're almost done.

4 (Whereupon, a recess was taken
5 at this time.)

6 BY MR. SCOLLAN:

7 Q. For all the companies that we've
8 discussed so far today that Romgo has
9 issued payments to, does Romgo have any
10 written agreements or contracts with any
11 of these companies?

12 A. No.

13 Q. Have any of these companies ever
14 sent you an invoice?

15 A. No.

16 Q. So when Romgo's technicians --
17 so let me take a step back.

18 So now there comes a day when
19 Romgo's technicians are actually at the
20 healthcare clinic, right?

21 A. Right.

22 Q. Can you just walk me through the
23 process by which a Romgo technician
24 provides services to a patient?

25 A. Yes. So the technician sits in

1 D. Balter

2 a room and the front desk brings in a
3 patient. The patient fills out the forms.
4 The technician performs the test. After
5 the test is completed the technician fills
6 out the form with the results.

7 Q. And what kind of machine do
8 Romgo technicians use?

9 A. They use Chattanooga.

10 Q. Do you have any documents in
11 your possession that shows specifically
12 the make and model of this machine?

13 A. No.

14 Q. Since 2021, have all of Romgo's
15 technicians only used this Chattanooga
16 machine to provide services at these
17 clinics?

18 A. No.

19 MR. SCOLLAN: Can you just
20 repeat the question and the answer?

21 (Whereupon, the record was read
22 by the reporter.)

23 BY MR. SCOLLAN:

24 Q. What other machines have they
25 used other than the Chattanooga machine?

1 D. Balter

2 A. There was no brand name on the
3 machine but it said "shockwave" on it.

4 Q. Do you know the make and model
5 of any of the machines that Romgo's techs
6 used?

7 A. I only know the Chattanooga
8 model. I don't know the other ones.

9 Q. You mentioned "shockwave." Do
10 you know what the shockwave machine looks
11 like?

12 A. Yes, I do.

13 Q. Can you describe what it looks
14 like?

15 A. It looks something like a small
16 printer that has something that looks like
17 a pistol that's attached to it. The
18 machine has a touch screen and you enter
19 the test parameters on the screen.

20 Q. How big is it?

21 MR. MESTECKIN: For the record,
22 the witness showed about two feet in
23 length of the equipment.

24 A. Yes, it looks something like
25 this but I'm not sure about the exact

1 D. Balter

2 measurements in inches or centimeters.

3 Q. Did Romgo own any of these
4 machines that it used for shockwave
5 technician services?

6 A. Yes.

7 Q. How many machines did Romgo own?

8 A. Four.

9 Q. Four?

10 THE INTERPRETER: Four.

11 Q. When providing shockwave
12 technician services at the clinics, did
13 Romgo's technicians ever use a machine
14 other than one owned by Romgo?

15 A. No.

16 Q. So even if an outside company
17 was paid for technician services such as,
18 for example, Trydat, Inc., Trydat would
19 use one of the machines owned by Romgo,
20 correct?

21 A. No. When Trydat was covering
22 for my technicians they actually provided
23 their own machines. They had their own
24 machines.

25 Q. Would any other company provide

1 D. Balter

2 their own machines other than Trydat?

3 A. No.

4 Q. The four machines that Romgo
5 owned, were they all the same make and
6 model?

7 A. Yes.

8 Q. How much did each of them cost?

9 A. About 2400.

10 Q. Through what bank account did
11 you purchase each of these machines
12 through?

13 A. Through the Romgo account.

14 Q. Do you remember which company
15 you paid? Was it Chattanooga or a
16 different company?

17 A. I don't remember.

18 Q. How would the technicians have
19 access to Romgo's machines at the clinics;
20 would they pick them up from you or were
21 the machines already at the clinic when
22 they showed up?

23 MR. MESTECKIN: Objection to
24 form.

25 You may answer.

1 D. Balter

2 A. They would pick up the machine
3 from me and it would be at their disposal
4 to use at all times.

5 Q. When the technician was done
6 with the machine for the day what would
7 they do with it?

8 A. They would keep it.

9 Q. They would bring it home?

10 A. I don't know. Maybe left it in
11 the car. Maybe brought it home.

12 Q. Do you still have all of these
13 machines in your possession?

14 A. Yes.

15 Q. What is shockwave treatment?

16 A. What shockwave treatment does is
17 gives a patient massage. It gives
18 impulses which go underneath the skin.
19 They help circulate the blood which helps
20 alleviate the pain that they have.

21 Q. And what you've just described
22 is that the treatment that you provided
23 through Romgo on behalf of Yana?

24 A. Yes.

25 Q. Is that the treatment that Romgo

1 D. Balter

2 provided in exchange for the checks that
3 Yana handed to you that were issued from
4 Evergreen & Remegone's bank account?

5 A. Yes.

6 Q. How long does the treatment take
7 from beginning to end?

8 MR. MESTECHKIN: Counsel, you
9 mean for a single patient?

10 MR. SCOLLAN: Sure. So let's
11 take a step back.

12 BY MR. SCOLLAN:

13 Q. Please describe the process by
14 which a Romgo technician provided the
15 shockwave treatment to a patient.

16 A. The patient comes into the room,
17 as I've stated before. One of the front
18 desk staff brings them in. The patient
19 signs the forms. Then we do the test and
20 upon completion of the test we fill out
21 the form with the test results.

22 Q. So please describe how the
23 actual test is performed.

24 A. It depends on where exactly the
25 patient has pain. They can have pain in

1 D. Balter

2 their neck or in their back. If it's a
3 male patient they take their shirt off.
4 If it's a female patient and they have
5 pain in their lower back, they just lift
6 their shirt up a little bit. And then we
7 do the treatment to the body parts that
8 hurt. The treatment takes about five to
9 seven minutes for one body part depending
10 on what the speed setting on the machine
11 is.

12 Q. So to treat a specific body part
13 do you place anything on the patient's
14 body?

15 A. Yes. I put the pistol that I
16 described to the body part that I have to
17 treat, and that's the part of the machine
18 that sends impulses.

19 Q. How big is the pistol?

20 A. About six to seven inches long.
21 And the handle is probably about five
22 inches long.

23 Q. And the treatment that you just
24 described, the technician would hold the
25 pistol on the specific body part of the

1 D. Balter

2 patient for five to seven minutes,
3 correct?

4 A. Yes.

5 Q. And it's your understanding that
6 while this treatment is happening the only
7 two people in the room are the Romgo
8 technician and the patient, correct?

9 A. Yes.

10 Q. And that's true for every
11 patient that Romgo provided technician
12 services for in exchange for payment from
13 Yana Mironovich, correct?

14 A. Yes.

15 Q. Is another name for the
16 technician services and the test that you
17 just prescribed radial pressure wave
18 therapy?

19 A. Yes.

20 Q. So based on your understanding
21 radial pressure wave therapy and shockwave
22 therapy are the same thing, correct?

23 A. Yes.

24 Q. Were any of the technicians that
25 provided services on behalf of Romgo

1 D. Balter

2 issued a W-2?

3 A. No.

4 Q. Is that because all of the
5 technicians that provided services through
6 Romgo were treated as independent
7 contractors?

8 A. Yes.

9 Q. Do you know who George Collins
10 is?

11 A. No -- I apologize.

12 Yes, I actually do know who he
13 is. I remember now.

14 Q. Who is he?

15 A. I don't remember if he's ever
16 worked for me but I do know that he's
17 Milana's son. The Milana that worked as a
18 technician for me.

19 MR. SCOLLAN: Okay. So I can --
20 and I was hoping this would help
21 refresh your recollection, but I
22 marked as Exhibit 10, a 3-page
23 document which includes some forms,
24 1099s, that were provided to myself by
25 Mr. Balter pursuant to subpoena in

1 D. Balter

2 this case, and page 2 of the 3-page
3 document.

4 [The document was hereby marked
5 as Exhibit 10 for identification, as
6 of this date.]

7 BY MR. SCOLLAN:

8 Q. Do you recognize that as a 1099
9 issued to George Collins?

10 A. Yes.

11 Q. And Mr. Collins was a technician
12 who provided services through Romgo,
13 correct?

14 A. Yes.

15 MR. SCOLLAN: I'm going to mark
16 -- this is Exhibit 11. It's a 27-page
17 document which includes bills and
18 other forms submitted under the Stybel
19 practice to GEICO.

20 [The document was hereby marked
21 as Exhibit 11 for identification, as
22 of this date.]

23 BY MR. SCOLLAN:

24 Q. I will scroll to the page that
25 I'm specifically going to ask questions

1 D. Balter

2 about. And, of course, zoom in and
3 provide Mr. Balter with a better view of
4 what we're looking at.

5 So page 5 is a document. The
6 title appears to say: "Informed Consent
7 for Radial Pressure Wave Therapy."

8 Do you recognize this document?

9 A. Yes.

10 Q. Is this one of the forms that
11 Yana gave you?

12 A. I don't remember.

13 Q. Page 7, it's a document called
14 "Therapeutic Shockwave Treatment Plan."

15 MR. MESTECHKIN: Counsel, for
16 the record, I just want to note that
17 large portion of the document
18 appearing on the screen appears to be
19 obstructed by some sort of a huge
20 thing that covers the majority of the
21 text appearing on the page.

22 MR. SCOLLAN: Yes, I agree with
23 that. This is one of the forms
24 submitted by the Stybel practice to
25 GEICO. I believe virtually all of the

1 D. Balter

2 bills and forms that I look at from
3 the Stybel practice contained this
4 exact stain.

5 BY MR. SCOLLAN:

6 Q. Do you recognize this form, sir?

7 A. No.

8 Q. Page 8, do you recognize the
9 form titled "Therapeutic Shockwave
10 Assessment Form"?

11 A. No.

12 Q. Page 21. This is a document
13 titled "Radial Pressure Wave Therapy
14 Report." Do you recognize this form?

15 A. Yes.

16 Q. What is it?

17 A. It's the form that's filled out
18 after a treatment is completed and at the
19 bottom you fill out the treatment
20 parameters.

21 Q. And these are the forms that
22 Romgo's technicians fill out, correct?

23 A. Yes.

24 Q. And this is a form that was
25 given to you by Yana that you made a copy

1 D. Balter

2 of, correct?

3 A. Yes.

4 Q. Looking at the bottom of the
5 document, or let's look at the whole
6 document first.

7 Do Romgo's technicians -- let me
8 take a step back.

9 Which portion of this document
10 do Romgo's technicians fill out when
11 providing services to a patient?

12 A. The top of the document and the
13 bottom of the document where it says
14 "frequency and parameters."

15 Q. So they specifically check off
16 the sections of the body in the top
17 portion of the report that are treated,
18 correct?

19 A. Yes.

20 Q. And then do they check off the
21 frequency per week that the patient is
22 receiving?

23 A. Yes.

24 Q. Do you know what it means when
25 it's checked off "frequency, zero to one

1 D. Balter

2 times" and circled "per week"?

3 A. I guess that means that the
4 patient gets treatment once a week.

5 Q. Do you know or are you guessing
6 that's what it means?

7 A. I think so. I don't know.

8 Q. What does "pressure intensity"
9 section mean. What's filled out there?

10 A. It is the intensity at which the
11 machine is going to work on the patient's
12 body. One bar is the lowest setting and
13 ten to twelve bars is the highest setting.

14 Q. So specifically for this
15 patient, what do these numbers mean?

16 A. It means that they changed the
17 machine setting from 1.5 bar to 1.6 bar,
18 which means that they had more pain in one
19 body part versus another body part.

20 Q. Do you know which number
21 corresponds to which body part?

22 A. No.

23 Q. Because it says here, I believe
24 it says "1.5, one point something and 1.6"
25 right next to "pressure intensity,"

1 D. Balter

2 correct?

3 MR. MESTECHKIN: Did you hear
4 the answer?

5 MR. SCOLLAN: I didn't.

6 THE INTERPRETER: I'm sorry. I
7 didn't hear anything.

8 A. Yes.

9 Q. And then beneath it I believe it
10 says "1.500, 1 point, possibly, 600 and
11 then 1.300," correct?

12 A. Yes.

13 Q. Can you explain what each of
14 these numbers mean?

15 A. It shows the speed at which the
16 machine is going to be working at. The
17 lower the number the slower the machine is
18 going to work.

19 Q. So the -- next to -- what's the
20 highest speed that the machine works at?

21 A. I don't remember.

22 Q. Do you remember the highest
23 speed that it works at?

24 MR. MESTECHKIN: Objection.

25 Counsel, are you asking about

1 D. Balter

2 intensity or pulses?

3 MR. SCOLLAN: I'm asking about
4 intensity.

5 MR. MESTECHKIN: Okay.

6 A. The lowest intensity is point
7 five bar. And the highest intensity on
8 some machine is 12.

9 Q. Do you see where on the report
10 it says "bar" and in parentheses (1.0 to
11 10)?

12 A. Yes.

13 Q. So does that indicate to you
14 that the highest intensity would actually
15 be ten?

16 A. In this case, yes.

17 Q. Is there anything filled out
18 related to the pulses for this treatment?

19 A. In this document?

20 Q. Yes.

21 A. No.

22 Q. Should it be?

23 A. Yes. It says "1,500, 1,400 and
24 1,300."

25 Q. Okay. So I wanted to confirm.

1 D. Balter

2 Those numbers that you just said
3 relate to pulses, correct?

4 A. Yes.

5 Q. And what does pulses mean? Like
6 when it says 1500 pulses, what does that
7 mean?

8 A. I think I've answered this
9 question before. I thought that I was
10 answering a question about pulses. That's
11 the speed at which the machine is going to
12 be working at.

13 Q. And is that based on
14 specifically turning a knob on the
15 machine?

16 A. Yes.

17 Q. Looking at the report do you
18 know how many pulses were used for the
19 cervical part of the body for this
20 patient?

21 A. No.

22 Q. Do you know how many pulses were
23 used for the thoracic part of the body for
24 this patient?

25 A. No.

1 D. Balter

2 Q. Do you know how many pulses were
3 used for the lumbar section of the
4 patient's body?

5 A. No.

6 Q. Under the "frequency" section,
7 does it say "nine" and then "ten" and then
8 "seven"?

9 A. Yes.

10 Q. And that corresponds to "Hz";
11 what does that mean?

12 A. It means hertz.

13 Q. And the highest is 16 and the
14 lowest is three, correct?

15 A. Yes.

16 Q. Do you know the level of hertz
17 that corresponds to any of the body parts
18 that was treated on this patient?

19 A. No.

20 Q. Should you be able to tell that
21 from looking at that report?

22 A. No, because that would depend on
23 the technician performing the test. Some
24 of them would choose to do it in the order
25 of cervical thoracic and lumbar. Some of

1 D. Balter

2 them might use a different order.

3 Q. Should Romgo's technicians be
4 noting on the report the pressure
5 intensity for each part of the body that
6 is treated on the patient?

7 A. Yes.

8 Q. And they should be doing it in a
9 way so that you or someone else who picks
10 up the report knows the pressure intensity
11 for each specific part of the body, right?

12 A. No.

13 Q. Why not?

14 A. Because no one said that the
15 document has to be filled out in a
16 specific way.

17 Q. I'm asking you if you train your
18 technicians to specifically note the
19 pressure intensity for each corresponding
20 part of the patient's body?

21 A. No.

22 Q. Is there any way to tell by
23 looking at this document either the
24 pressure intensity, the pulse or the
25 frequency that was applied to this

1 D. Balter

2 patient's cervical part of their body?

3 A. No.

4 Q. Is there any way to tell the
5 pressure intensity, pulse or frequency
6 that was applied to either the thoracic
7 section of the patient's body or the
8 lumbar section of the patient's body?

9 A. No.

10 Q. What does it mean when it's
11 checked off "Type of Transmitter, Red R40"

12 A. I don't know.

13 Q. Do you know what it means when
14 it's checked off "Black D20"?

15 A. I don't know.

16 Q. When Yana gave you radial
17 pressure therapy reports, were they
18 already pre-signed?

19 A. No.

20 Q. Do you know who signed this
21 report on page 21 of the exhibit?

22 A. No.

23 Q. Looking at page 22, it's a
24 document titled "Extracorporeal
25 Shockwave." It's a report called

1 D. Balter

2 "Extracorporeal Shockwave and RPW

3 Treatment."

4 Do you see that, sir?

5 A. Yes.

6 Q. Do you recognize this form?

7 A. Yes.

8 Q. Did Yana give you a copy of this
9 form?

10 A. Yes.

11 Q. And this is a form that your
12 Romgo technicians fill out in the clinics?

13 A. Yes.

14 Q. Page 23, it's an assignment of
15 benefits with Dr. Stybel's name at the
16 top.

17 Do you recognize this form?

18 A. Yes.

19 Q. This is another form that Yana
20 gave you?

21 A. Yes.

22 Q. And as discussed before, when
23 Yana gave you a copy of the assignment of
24 benefits form it was already signed by the
25 provider, correct?

1 D. Balter

2 A. Yes.

3 Q. Do you recognize the clinic
4 located at 1110 Pelham Parkway, Bronx?

5 A. No.

6 Q. How about 150 Graham Avenue,
7 Brooklyn?

8 A. No.

9 Q. How about 6011 East New York
10 Avenue, Brooklyn?

11 A. No.

12 Q. 1568 Ralph Avenue, Brooklyn?

13 A. Yes.

14 Q. How are you familiar with that
15 location?

16 A. The technician would go there
17 and perform tests.

18 Q. Was this one of the locations
19 where Yana scheduled Romgo's technicians?

20 A. Yes.

21 Q. 2088 Flatbush Avenue in
22 Brooklyn?

23 A. Yes.

24 Q. Was this one of the locations
25 where Yana scheduled Romgo's technicians?

1 D. Balter

2 A. Yes.

3 Q. 717 Southern Boulevard in the
4 Bronx?

5 A. Yes.

6 Q. Was this one the clinics where
7 Yana scheduled Romgo's technicians?

8 A. Yes.

9 Q. 282-284 Avenue X in Brooklyn?

10 A. Yes.

11 Q. Was this one of the locations
12 where Yana scheduled Romgo's technicians?

13 A. Yes.

14 Q. 430 West Merrick Road, Valley
15 Stream?

16 A. No.

17 Q. 3000 Eastchester Road, Bronx?

18 A. No.

19 Q. 79-45 Metropolitan Avenue,
20 Queens?

21 A. No.

22 Q. 611 East 76th Street in
23 Brooklyn?

24 A. Yes.

25 Q. Was this one of the locations

1 D. Balter

2 where Yana scheduled Romgo's technicians?

3 A. Yes.

4 Q. 219-16 Linden Boulevard in
5 Queens?

6 A. Yes.

7 Q. Was this location where Yana
8 scheduled Romgo's technicians?

9 A. Yes.

10 Q. And by "scheduled," I mean Yana
11 specifically told you that Romgo's
12 technicians would go to these clinics to
13 provide the technical services that we
14 discussed today, correct?

15 A. Yes.

16 MR. SCOLLAN: Off the record.

17 (Whereupon, a discussion was
18 held off the record.)

19 BY MR. SCOLLAN:

20 Q. I'm going to list some locations
21 for you, sir.

22 Do you recognize the following
23 locations: 175 Fulton Avenue in
24 Hempstead. 332 East 149th Street in the
25 Bronx. 1894 Eastchester Road in the

1 D. Balter

2 Bronx. 2273 65th Street in Brooklyn, and
3 1655 Richmond Avenue in Staten Island.

4 MR. SCOLLAN: Could you just
5 repeat that?

6 (Interpreter complies.)

7 THE INTERPRETER: This is the
8 interpreter speaking, I'm so sorry.

9 MR. SCOLLAN: I'll share my
10 screen.

11 For the record, I'm just sharing
12 my screen with Madam Interpreter to
13 show her a list of locations that I
14 just asked the witness about.

15 THE INTERPRETER: Yes, and I was
16 at 1894 --

17 A. Yes, there is one other location
18 that I recognized. It's 3626 --

19 THE INTERPRETER: Where is the
20 3626? I don't see it.

21 MR. SCOLLAN: Right here.

22 THE INTERPRETER: 3626 East
23 Tremont Avenue. I just didn't see it
24 the first time.

25 MR. SCOLLAN: That's okay.

1 D. Balter

2 BY MR. SCOLLAN:

3 Q. So for each of those locations
4 did Yana contact you to schedule Romgo's
5 technicians to go to those locations to
6 provide technician services?

7 A. No. Yana had a board with a
8 schedule for the entire month.

9 Q. Okay. So is it fair to say for
10 175 Fulton Avenue, 332 East 149th Street,
11 1894 Eastchester Road, 3626 East Tremont
12 Avenue, 2273 65th Street, and 1655
13 Richmond Avenue, these were also locations
14 where Yana scheduled Romgo's technicians
15 to go provide technical services, correct?

16 A. Yes.

17 Q. Did Yana during the time that
18 you provided technicians to her did she
19 work with anyone named Eric?

20 A. I don't know.

21 Q. Do you know, are you familiar
22 with the name Eric Meladze.

23 M-E-L-A-D-Z-E?

24 A. No.

25 Q. Are you familiar with a company

1 D. Balter

2 called Blue Tech Supplies, Inc.?

3 A. No.

4 Q. Are you familiar with a company
5 called Sunstone Services, Inc.?

6 A. No.

7 MR. SCOLLAN: Let's just take
8 five minutes. I think we're done.

9 Thank you.

10 MR. MESTECHKIN: Thank you.

11 (Whereupon, a recess was taken
12 at this time.)

13 MR. SCOLLAN: So I just have one
14 more question.

15 BY MR. SCOLLAN:

16 Q. Mr. Balter, approximately for
17 what time period did Romgo provide
18 technicians to Yana for?

19 A. For four to six months.

20 Q. Because looking back at Exhibit
21 6, which I'll share my screen with you,
22 the first check issued from Evergreen &
23 Remegone, LLC, to Romgo is -- at least in
24 this exhibit, is dated August of 2021.

25 Do you see that?

1 D. Balter

2 A. Yes.

3 Q. And, obviously, this would have
4 been for services rendered prior to August
5 10th of 2021, correct?

6 A. Yes.

7 Q. Do you remember approximately
8 what month and year Yana stopped
9 contacting you for technicians?

10 A. I don't remember.

11 MR. SCOLLAN: I have no further
12 questions at this time.

13 Mr. Mestechkin, do you have any
14 questions?

15 MR. MESTECHKIN: I do have maybe
16 a handful of questions that I would
17 like to ask on the record.

18 MR. SCOLLAN: Sure.

19 EXAMINATION BY

20 MR. MESTECHKIN:

21 Q. From the payments that you
22 received from Yana, did you provide Yana
23 with any payment back in the form of
24 kickbacks?

25 A. No.

1 D. Balter

2 Q. Did you ever issue any payments
3 in any form to Dr. Stybel?

4 A. No.

5 Q. Did you issue any payment in any
6 form to Evergreen & Remegone?

7 A. No.

8 Q. Did Romgo ever bill GEICO for
9 its tech services rendered to any
10 patients?

11 THE INTERPRETER: It is the
12 interpreter speaking. Can you repeat
13 the question, please?

14 MR. MESTECHKIN: Of course. Of
15 course.

16 BY MR. MESTECHKIN:

17 Q. Did Romgo ever bill GEICO for
18 its services?

19 A. No.

20 MR. MESTECHKIN: I have no
21 further questions.

22 MR. SCOLLAN: Thank you.

23 I just have a closing remark.

24 Obviously I have no further
25 questions at this time.

1 D. Balter

2 GEICO just reserves all rights
3 to request further discovery from
4 Romgo and Mr. Balter in addition to
5 what I've already placed on the
6 record.

7 I would ask that Mr. Balter and
8 Romgo preserve the actual machines
9 that they used on behalf of Romgo for
10 the services rendered that were
11 scheduled by Yana Mironovich and any
12 documents relating to the capability
13 of those machines.

14 MR. MESTECHKIN: Noted.

15 To the extent that our client
16 has any documents pertaining to the
17 machines, we will preserve them. And
18 any request for documents that GEICO
19 may be issuing to our client, we ask
20 to direct to our office.

21 MR. SCOLLAN: Of course.

22 And I'll just state again, GEICO
23 requests that the actual physical
24 machines themselves are preserved.

25 MR. MESTECHKIN: So noted.

1 D. Balter

2 Thank you.

3 MR. SCOLLAN: Thank you so much,
4 Mr. Mestechkin, and always a pleasure
5 and everyone have a great day.

6 MR. MESTECHKIN: Thank you so
7 much.

8 Miss Interpreter, thank you so
9 much. You did an amazing job.

10 THE INTERPRETER: Thank you.

11 MR. SCOLLAN: Are you requesting
12 a copy of the transcript, Oleg?

13 MR. MESTECHKIN: Not at this
14 time. I don't think I need it at this
15 point. We'll see where it will take
16 us.

17 (Continued on next page to allow
18 for jurat.)

19

20

21

22

23

24

25

1 D. Balter

2 MR. SCOLLAN: For the record,
3 Mr. Mestechkin just noted he's not at
4 this time requesting a copy of the
5 transcript. I just wanted to see what
6 his answer would be related to that.
7 And, again, with that we'll close the
8 record, and thank you everyone for
9 their time.

10 MR. MESTECHKIN: Thank you.

11 [TIME NOTED: 2:35 p.m.]
12
13

DENNIS BALTER

14
15

16 Subscribed and sworn to
before me this -----
17 day of -----, 2023.
18

Notary Public
19
20
21
22
23
24
25

I N D E X

WITNESS EXAMINATION BY PAGE

DENNIS BALTER

MR. SCOLLAN 5

MR. MESTECKIN 108

E X H I B I T S

DESCRIPTION PAGE

Exhibit 1 Subpoena 5

Exhibit 2 13-page document 19

Exhibit 3 NF-3 form 25

Exhibit 4 Subpoena 28

Exhibit 5 E-mail 30

Exhibit 6 9-page document 32

Exhibit 7 Photograph 61

Exhibit 8 Investors Bank
statement 62

Exhibit 9 Bank records, 20 pages 75

Exhibit 10 1099 forms 90

Exhibit 11 Extracorporeal
Shockwave and RPW
Treatment, 27 pages 90

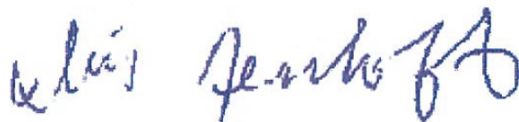
CERTIFICATION

I, IRIS FERNHOFF, a Notary Public for and within the State of New York, do hereby certify:

That the witness whose testimony as herein set forth, was duly sworn by me; and that the within transcript is a true record of the testimony given by said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 27th day of February, 2023.



IRIS FERNHOFF

* * *

ERRATA SHEET
VERITEXT/NEW YORK REPORTING, LLC

CASE NAME: GOVERNMENT EMPLOYEES
INSURANCE COMPANY, et al v. ELENA
BORISOVNA STYBEL, D.O., et al
DATE OF DEPOSITION: February 16, 2023
WITNESS' NAME: DENNIS BALTER

PAGE/LINE(S) /	CHANGE	REASON
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----
----- / ----- /	----- /	-----

DENNIS BALTER
SUBSCRIBED AND SWORN TO
BEFORE ME THIS _____ DAY
OF _____, 20 ____.

NOTARY PUBLIC

MY COMMISSION EXPIRES _____

[& - 22nd]

Page 1

&	100 11:12 15:22 46:25	1251 9:14 12th 28:20	89:2 90:2 113:12
& 1:11 29:13 29:16,25 31:18 32:8,22 33:5 33:15,20 34:7 34:19 35:13 36:5,24 37:16 38:6 40:23 41:3 42:2,11 42:20 43:7,19 62:12 86:4 107:22 109:6	1023 35:14 1025 36:5 10314 2:11 1039 37:16 1045 36:25 1049 41:18 1051 40:24 1056 42:3 1066 42:20 74:16 1073 43:6 108 113:6 1090 79:9 1099 31:7 51:18 52:24 53:3,6,8 59:12 59:15 90:8 113:20 1099s 89:24 10:25 1:16 10th 108:5 11 90:16,21 113:21 11.166666. 46:15 1110 102:4 11224 4:24 11229 17:2 11235 2:17 11556 2:5 11th 60:11 12 96:8	13 19:11 113:12 14 79:7 146 9:23 149th 104:24 106:10 14th 37:15 150 46:25 102:6 1500 97:6 1568 102:12 16 1:16 30:14 62:16 98:13 115:5 1655 105:3 106:12 16610 114:18 1733 2:16 175 104:23 106:10 17g 4:23 1894 104:25 105:16 106:11 19 30:23 113:12 1975 9:23 1980 16:25 19th 37:15 1:22 1:4	2,050 36:25 2,750 42:3 2,850 37:17 20 75:9 113:19 115:23 200 65:22 66:5 66:6,8,9,10,16 66:18 67:12 68:11 70:24 71:3,6,10,11 2000 79:9 2021 10:15,20 11:6 37:15 40:24 50:13 63:3 72:13,23 79:8 81:14 107:24 108:5 2022 28:20 30:14,23 2023 1:16 112:17 114:17 115:5 205 17:2 2088 102:21 20th 79:8 21 92:12 100:21 219-16 104:4 22 100:23 2273 105:2 106:12 22nd 16:25
0			
02834 1:4			
1			
1 1:13 5:16,23 25:13 32:7 95:10 113:11 1,000 64:12 65:20 66:6 72:22 1,050 66:21 1,300 96:24 1,400 96:23 1,500 96:23 1.0 96:10 1.300 95:11 1.5 94:17,24 1.500 95:10 1.6 94:17,24 10 1:13 89:22 90:5 96:11 113:20		2 18:25 19:3,11 20:11 26:10 35:12 36:4	

[23 - address]

Page 2

23 101:14	3rd 2:11	7	a
2400 84:9	4	7 42:10 61:22	a.m. 1:16
25 113:13	4 19:16,16	61:25 64:9	ability 7:24
250 71:18,21,24	28:11,14,18	67:9,14 91:13	able 98:20
71:25 72:7	29:2 30:18	113:17	above 1:19
26th 72:13,23	37:14 39:7	717 103:3	access 84:19
27 90:16	113:14	718 18:6	account 17:7
113:22	40 15:3	75 113:19	32:16 36:9
27th 114:17	400 74:15	76th 103:22	55:20 63:8,10
28 113:14	420-7283 17:6	79-45 103:19	63:14,23 67:4
282-284 103:9	47:11	8	84:10,13 86:4
2:35 112:11	430 103:14	8 42:19 46:8	accountant
3	5	62:16,18 68:12	59:19 60:5
3 19:17 25:9,11	5 29:22 30:5,9	74:13 92:8	accounts 56:3
26:7 36:23	40:21 91:5	113:18	accurate 59:22
89:22 90:2	113:5,11,15	8,700 32:9	accurately 4:5
113:13,13	5-5 19:20 29:7	800 67:10,16	7:25
3,000 40:25	50 66:23	70:11	action 1:20
3,050 42:11	545 4:22	8th 26:10 35:4	114:13
3,100 41:18	6	36:12 37:5,19	actual 16:20
3,300 43:6	6 31:24 32:3	41:7,20 42:5	86:23 110:8,23
3,350 42:21	41:25 46:7,8	42:14,23 43:9	actually 65:15
46:9,15	75:18 107:21	44:5 47:4	80:19 83:22
3,450 35:15	113:16	48:17 59:9	89:12 96:14
3,600 36:7	600 95:10	9	addition 46:18
30 15:3 113:15	6011 102:9	9 31:24 43:5	110:4
300 18:13,16,21	61 113:17	75:9,15 113:16	additional 26:5
45:23 46:11,15	611 103:22	113:19	75:10
3000 103:17	62 113:18	90 113:20,22	address 4:21
3063 26:10	646 17:6 47:11	900 2:11	9:10,12 16:24
32 113:16	65th 105:2	915-0288 18:6	17:9 24:22
332 104:24	106:12	926 2:4	25:5,17 26:9
106:10			26:13,17,18
3626 105:18,20			60:12 63:16,19
105:22 106:11			63:21,22,23,24

[adjust - balter]

Page 3

adjust 56:21	answered 34:15 97:8	artem's 50:24	103:9,19
admit 72:18	answering 97:10	66:18	104:23 105:3
afternoon 30:24	answers 4:8	asked 34:14	105:23 106:10
ago 14:12	6:10,19	45:10 105:14	106:12,13
agree 91:22	anybody 12:11	asking 9:2,12	aware 11:23
agreed 3:3,8,12	16:10,21 22:22	55:2 78:11	b
agreements 80:10	44:4	95:25 96:3	b 113:9
al 5:20,21	anyone's 70:13	99:17	back 21:11,13
115:4,4	apartment 4:23	assessment 92:10	22:17 27:20
alex 44:8	16:25 63:17	assignment 21:4 22:7 23:3	46:7 48:2
alleviate 85:20	apologies 21:9	23:6,10,16	60:21 66:7
allow 6:18,19	54:24	24:3,21 25:2	71:23 72:20
111:17	apologize 10:19	25:14,20,24	80:17 86:11
amazing 111:9	53:16 70:19	26:3,6 44:23	87:2,5 93:8
amended 5:10	89:11	44:24 47:20	107:20 108:23
amount 32:9	app 76:18	101:14,23	balter 1:18
35:14 36:7,25	appearances 2:2	assisted 12:4	2:16 4:19 5:1,9
37:17 40:25	appearing 91:18,21	associated 68:7	5:18 6:1,2,23
41:18 42:3,10	appears 91:6	70:20	7:1 8:1 9:1
42:21 43:6	91:18	attached 31:6	10:1 11:1,24
64:12 67:15	applied 99:25	82:17	12:1 13:1 14:1
70:11 72:22	100:6	attend 14:24	15:1 16:1 17:1
74:15 78:9,11	appointment 39:14	attorney 2:9,15	18:1 19:1 20:1
79:9	approximately 107:16 108:7	5:5 7:10 8:8	21:1 22:1 23:1
answer 7:4,12	artem 50:16,22	attorneys 2:4	24:1,12 25:1
8:4,6 14:25	51:19,21 52:6	august 63:2	26:1 27:1 28:1
21:19 27:3	52:7,10,16,17	107:24 108:4	29:1 30:1 31:1
33:24 34:4	52:24 65:5	auto 53:24	31:11 32:1
40:4,6,19	66:3,8,15	69:22 70:21	33:1 34:1 35:1
43:24 45:18		74:3 77:18,19	36:1 37:1 38:1
55:24 72:4		avenue 2:11	38:18 39:1
81:20 84:25		4:23 9:14,19	40:1 41:1 42:1
95:4 112:6		102:6,10,12,21	43:1 44:1 45:1
			46:1 47:1 48:1
			49:1 50:1 51:1

[balter - call]

Page 4

52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1,22 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1,15 79:16 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 89:25 90:1 91:1,3 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1 104:1 105:1 106:1 107:1,16 108:1 109:1 110:1,4 110:7 111:1 112:1,13 113:5 115:5,21 bank 31:7 32:16,17 36:9 55:20 56:3 62:21 63:2,7 63:10,13,23 64:10 67:4 75:10 84:10 86:4 113:18,19	bar 94:12,17,17 96:7,10 bars 94:13 based 46:10 78:7 88:20 97:13 bay 2:16 beginning 19:20 34:11 86:7 behalf 14:8 15:20,25 16:8 37:12 38:3,10 39:19 40:11 57:14 59:13 73:3 85:23 88:25 110:9 believe 22:6 37:15 54:25 55:7 67:25 91:25 94:23 95:9 beneath 95:9 benefit 44:23 44:24 benefits 21:5 22:8 23:3,7,11 23:17 24:3,21 25:2,14,20,24 26:3,7 47:20 101:15,24 best 6:14,18,19 beta 79:10,11 79:24	better 91:3 big 82:20 87:19 bill 10:3 19:12 109:8,17 billed 22:23 billing 1:12 26:17,18 34:12 34:16 60:14 bills 90:17 92:2 bit 87:6 black 100:14 blood 85:19 114:14 blue 1:12 107:2 board 58:25 59:5 106:7 body 47:22 56:22 87:7,9 87:12,14,16,25 93:16 94:12,19 94:19,21 97:19 97:23 98:4,17 99:5,11,20 100:2,7,8 borisovna 1:10 1:11 2:9,10 5:13,14 19:13 19:19 20:14 25:15,17 29:5 29:10 115:4 borovyk 68:3,5 68:24 bottom 25:16 25:19 92:19 93:4,13	boulevard 9:23 9:24 103:3 104:4 brand 82:2 break 7:9 44:12 breaks 7:20 brighton 26:10 35:4 36:12 37:5,19 41:6 41:20 42:5,14 42:23 43:9 44:5 47:3 48:17 59:9 60:11 bring 39:2 49:10 85:9 brings 81:2 86:18 bronx 102:4 103:4,17 104:25 105:2 brooklyn 2:17 4:23 9:15 17:2 26:11 102:7,10 102:12,22 103:9,23 105:2 brought 66:4 85:11 business 16:24 busy 16:6 c calculate 39:4 call 27:13,18 30:16 50:3,4,5 50:9 61:18
---	---	--	--

[called - company]

Page 5

called 4:3 11:16 13:10 27:6 28:3,8 32:8 51:25 52:21 60:14 64:11 91:13 100:25 107:2,5 calling 61:13 calls 15:13 24:10 capability 110:12 capacity 8:16 9:5,9,13,18 car 85:11 case 11:25 28:19 62:25 75:13 90:2 96:16 115:3 casualty 1:7 catch 26:16 cell 17:23 18:2 centimeters 83:2 certain 5:11 12:2 29:23 78:6 certificate 14:15 68:2 certificates 14:23 15:10,15 certification 3:6 114:2 certifications 14:13 60:25	certify 114:6,12 cervical 97:19 98:25 100:2 change 115:6 changed 94:16 charge 18:8,10 charged 18:20 charges 45:23 chart 51:3 chattanooga 14:16 81:9,15 81:25 82:7 84:15 chebuchenko 50:25 check 8:21 31:7 32:6,7,20,23 33:14,19 34:7 34:15,16,19 35:2,6,10,12,14 35:17 36:4,5,8 36:11,23,25 37:2,11,14,15 37:19 38:2 40:22,24 41:2 41:9,16,18,19 41:25 42:3,4 42:10,13,19,19 42:22,25 43:5 43:5,8,12 46:8 46:17 52:5,19 53:20 54:4,20 55:9,19 64:11 64:15,17 65:16 65:20,24,25	66:21 67:8,14 67:17 68:13 69:25 70:10,14 70:17 72:12,21 73:4 74:13,15 76:13,17,19 78:5,9,19 79:8 79:9,23 93:15 93:20 107:22 checked 31:3 93:25 100:11 100:14 checks 31:25 38:9 39:5 43:17 46:20 47:4 62:12 67:3,5 75:19 76:17,22 77:2 77:7,12,17,23 78:12 86:2 choose 98:24 chubchenko 65:5 circled 94:2 circulate 85:19 civil 1:24 clarify 8:6,25 53:14 clean 46:11 client 24:18 110:15,19 clinic 45:24 47:14 48:7,9 49:2 57:9 58:4 58:5,16 80:20	84:21 102:3 clinics 45:7 81:17 83:12 84:19 101:12 103:6 104:12 close 112:7 closing 109:23 collectively 5:7 collins 89:9 90:9,11 come 21:12 56:19 57:2,3 comes 80:18 86:16 commission 115:25 communicated 68:23 communicati... 24:13 31:5 companies 10:14 36:21 61:4 74:11 79:3 80:7,11 80:13 company 1:6,6 1:7,7 5:20 8:18 8:20 9:3,4 10:6 10:11,22 11:14 11:15,17,18 12:24 14:16 16:6 18:11,20 29:16 32:7 33:9 38:6 51:23,24 52:20
---	---	---	---

[company - d]

Page 6

52:21 53:22 54:7,21 55:4,9 55:21 58:13 60:13 64:11 71:5,9 78:15 78:20,23 83:16 83:25 84:14,16 106:25 107:4 115:4 company's 53:21 54:5 compensate 52:16 54:21 72:6 compensated 51:21 53:10,18 54:2 71:21 compensates 55:18 compensation 55:3 complaint 5:10 completed 58:3 81:5 92:18 completion 86:20 complies 18:5 105:6 confer 30:16 confirm 31:4 51:4,7 96:25 confusing 72:18 connection 5:10	consent 91:6 contact 27:22 31:9 47:2,6,10 106:4 contacted 22:21 27:11 contacting 108:9 contained 92:3 continued 111:17 contractors 89:7 contracts 80:10 copies 15:9 41:12 48:14,20 copy 5:17 92:25 101:8,23 111:12 112:4 corner 25:19 corp 1:12 60:15 79:10,11,24 correct 10:8 12:2,6 23:13 23:24 29:13 31:19 33:17 34:15 43:21 45:25 47:15 48:20,23 49:12 49:16 54:22 58:13 59:10 64:24 66:16 74:24 78:23,24 79:5 83:20 88:3,8,13,22	90:13 92:22 93:2,18 95:2 95:11 97:3 98:14 101:25 104:14 106:15 108:5 corresponding 99:19 corresponds 94:21 98:10,17 cost 84:8 counsel 1:25 3:4 27:17 51:7 55:2 59:20 86:8 91:15 95:25 counsels 5:6 course 91:2 109:14,15 110:21 court 1:2 3:16 4:17,20 6:8,16 7:15 55:10 covering 83:21 covers 91:20 created 48:2,3 67:5 curious 38:14 38:16 cv 1:4 d d 4:11 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1,21	15:1 16:1 17:1 17:13 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1,22 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1 104:1 105:1 106:1,23 107:1 108:1 109:1 110:1
---	--	--	--

[d - eastern]

Page 7

<p>111:1 112:1 113:2 d.o. 1:10 2:9 29:10 115:4 d20 100:14 date 5:24 16:7 19:4 25:12,16 25:17 28:15 30:10 32:4 40:23 62:2,19 75:16 90:6,22 115:5 dated 28:20 30:23 37:14 40:23 72:13,22 79:8 107:24 day 16:9 18:13 18:16,21 45:15 45:23 49:2 57:4 58:17 65:23 66:8,10 66:11,13,16,19 67:12 68:11 70:23 71:3,7 71:10,11,22 72:2,7 75:6 80:18 85:6 111:5 112:17 114:17 115:22 days 39:4 46:12 46:24 65:22 december 30:14,23 defendants 1:13,14 2:9</p>	<p>dennis 1:18 2:16 4:19 5:9 17:14 31:11 112:13 113:5 115:5,21 dennismironov 17:12 24:6 department 34:17 depend 98:22 depending 78:7 87:9 depends 86:24 deposit 36:8 deposition 1:18 3:6,13 5:9 6:6 8:10 115:5 describe 13:25 14:22 47:17 56:17 82:13 86:13,22 described 13:14 15:19 57:17 85:21 87:16,24 description 113:10 desk 48:8 81:2 86:18 different 47:14 84:16 99:2 direct 110:20 discovery 110:3</p>	<p>discussed 31:2 56:8 80:8 101:22 104:14 discussion 60:19 104:17 disposal 85:3 district 1:2,3 divided 46:15 divisible 46:10 docket 1:4 doctor's 39:13 doctors 25:4 document 5:22 19:2,11 25:10 25:13,23 28:13 28:21 30:8 31:24 32:2 62:16,17 75:14 89:23 90:3,4 90:17,20 91:5 91:8,13,17 92:12 93:5,6,9 93:12,13 96:19 99:15,23 100:24 113:12 113:16 documents 12:2,5 17:8 28:6 29:23 41:13 74:7 81:10 110:12 110:16,18 doe 1:13 doing 7:18 99:8</p>	<p>dr 21:3,6 22:3,7 22:11 23:3,12 23:17 24:22 25:2 29:24,25 31:18 44:24 101:15 109:3 drafted 30:15 drop 59:3 duly 4:4,13 114:8 duties 16:8 49:15</p> <tr> <td colspan="4">e</td></tr> <tr> <td colspan="4"> <p>e 4:2,11,11,11 14:21 17:9,13 24:4,8,11,19 25:25 26:4 30:6,15,19,22 30:25 31:3,13 44:22 50:22 51:11 58:21 62:23 106:23 106:23 113:2,9 113:15 e.com. 14:21 earn 14:23 east 16:25 102:9 103:22 104:24 105:22 106:10,11 eastchester 103:17 104:25 106:11 eastern 1:3</p> </td></tr>	e				<p>e 4:2,11,11,11 14:21 17:9,13 24:4,8,11,19 25:25 26:4 30:6,15,19,22 30:25 31:3,13 44:22 50:22 51:11 58:21 62:23 106:23 106:23 113:2,9 113:15 e.com. 14:21 earn 14:23 east 16:25 102:9 103:22 104:24 105:22 106:10,11 eastchester 103:17 104:25 106:11 eastern 1:3</p>			
e											
<p>e 4:2,11,11,11 14:21 17:9,13 24:4,8,11,19 25:25 26:4 30:6,15,19,22 30:25 31:3,13 44:22 50:22 51:11 58:21 62:23 106:23 106:23 113:2,9 113:15 e.com. 14:21 earn 14:23 east 16:25 102:9 103:22 104:24 105:22 106:10,11 eastchester 103:17 104:25 106:11 eastern 1:3</p>											

[effect - find]

Page 8

effect 3:15	31:18 32:8,22	25:8,11 26:7	102:14 106:21
eiber 2:21	33:5,15,15,20	28:11,14,18	106:25 107:4
either 20:22	34:7,19 35:13	30:5,9,18	far 6:3 56:9
55:19 99:23	36:5,24 37:16	31:24 32:3	80:8
100:6	38:6 40:23	40:22 43:18	fault 10:4,7
elena 1:10,10	41:3,17 42:2	46:7,8 61:22	57:10
2:9,9 5:12,14	42:11,20 43:7	61:25 62:16,18	fecte 9:6,18 10:3
19:12,18 20:14	43:12,19 46:9	67:9 75:9,15	10:11,14 11:8
25:15,16 29:4	59:13,17 62:12	75:19 79:7	11:10
29:10 115:4	86:4 107:22	89:22 90:5,16	february 1:16
eleven 46:12	109:6	90:21 100:21	114:17 115:5
empire 9:23	exact 60:12	107:20,24	federal 1:23
employees 1:6	82:25 92:4	113:11,12,13	fee 18:14
5:20 76:4	exactly 71:19	113:14,15,16	feel 31:9
115:3	86:24	113:17,18,19	feet 82:22
endorsement	examination	113:20,21	female 54:13
32:20	5:2 108:19	expires 115:25	54:14,18 87:4
english 4:7,9	113:3	explain 13:6	fernhoff 1:21
enter 82:18	examined 4:14	95:13	114:4,20
entire 106:8	example 83:18	extent 24:17	figure 28:7
entities 5:12	except 3:9	110:15	file 60:4
29:4	exchange 30:6	extra 66:23	filed 5:11 60:2
entitled 1:19	33:16,20 34:7	extracorporeal	66:11,13
envelope 49:5,6	43:13,20 73:3	100:24 101:2	filing 3:5
49:7,11	73:8,14,19,23	113:21	fill 39:8 47:13
equipment	74:5,9 77:3,8	ez 53:24 69:22	70:17 76:12
82:23	77:13,19,24	70:21 74:3	86:20 92:19,22
eric 1:12	78:20 79:4	77:18,19	93:10 101:12
106:19,22	86:2 88:12	f	filled 26:6
errata 115:2	exchanged	fair 38:18	65:15,18 92:17
esq 2:6,8,18	17:19 24:11	78:18,25 106:9	94:9 96:17
et 5:20,21	61:10	faithfully 4:6	99:15
115:4,4	exhibit 5:16,23	familiar 11:15	fills 81:3,5
evergreen 1:11	18:25 19:3,10	14:19 29:15	find 14:3 31:6
29:13,16,25	19:16 20:11	60:13 65:4	40:9 45:17

[find - half]

Page 9

49:16,22 50:2 fine 7:10 51:9 72:17 finish 6:18,20 58:6 first 4:12 7:12 19:11 20:10,15 25:4 27:10,18 32:7 39:14 47:19 63:5,16 79:14 93:6 105:24 107:22 five 21:9,11,13 65:22 66:4,5 80:2 87:8,21 88:2 96:7 107:8 fl 2:11 flat 18:14 flatbush 102:21 floor 26:10 follow 30:15 following 104:22 follows 4:15 force 3:15 forget 70:19 form 3:9 19:17 22:8 23:3,7,9 23:11,17 24:3 25:2,14,24 26:4,7 27:2 40:3 43:23 44:24 55:23 81:6 84:24	86:21 92:6,9 92:10,14,17,24 101:6,9,11,17 101:19,24 108:23 109:3,6 113:13 forms 44:23 48:3,6,12,13,16 48:20,22 49:3 49:11 81:3 86:19 89:23 90:18 91:10,23 92:2,21 113:20 forth 114:8 forward 11:22 four 47:13 71:17 83:8,9 83:10 84:4 107:19 fourth 47:23 free 18:3 31:9 frequency 93:14,21,25 98:6 99:25 100:5 friends 49:20 49:20,20 front 48:8 81:2 86:17 fulton 104:23 106:10 functional 8:16 9:5,9,13,17 further 3:8,12 108:11 109:21	109:24 110:3 114:12 g g 11:3 51:11 garin 2:6 5:4 19:25 30:24 geico 1:6,6,7 5:7,11 15:13 24:10 90:19 91:25 109:8,17 110:2,18,22 gena 50:16 51:19 53:6,10 53:13,18 70:22 gena's 51:14 70:23 general 1:6 27:20 generated 66:15 genna 51:11 george 89:9 90:9 getting 12:5 give 6:9 7:4 21:9 24:2 34:18 51:20 57:21 58:23 101:8 given 4:8 23:2 92:25 114:10 gives 85:17,17 gmail 17:7 gmail.com. 17:12,13 24:6	30:7 go 6:5 13:9 17:14 26:22 38:22 45:10 46:22 58:17,20 60:17 85:18 102:16 104:12 106:5,15 going 11:22 12:16 18:24 19:21 25:7 28:10,23 29:2 30:4 40:21 46:7 68:12 75:18 90:15,25 94:11 95:16,18 97:11 104:20 good 5:4 6:21 6:22 8:6 16:18 20:4 30:24 government 1:6 5:19 115:3 graham 102:6 great 111:5 grechishkina 11:20 ground 6:7 group 2:15 guess 94:3 guessing 94:5 h h 44:9 113:9 half 13:18 20:14 26:21
---	--	---	--

[hand - interpreter]

Page 10

hand 34:23 35:17 36:11 37:2,4,18 41:2 41:19 42:4,13 42:22 43:8 48:16 114:17 handed 34:25 41:14 62:11 86:3 handful 108:16 handle 87:21 handwriting 32:19 70:9,13 handwritten 76:16 happening 88:6 hauling 53:24 69:22 70:21 74:3 77:18,19 head 6:25 healthcare 27:10 28:3 33:11,22 34:5 40:10 45:3,14 45:18 73:12,17 73:22 74:3,8 80:20 hear 6:3 7:19 20:22 23:21 34:11 79:13 95:3,7 held 1:20 60:20 104:18 help 59:25 85:19 89:20	helped 49:22 71:15 helps 85:19 hempstead 104:24 hereto 3:5 hereunto 114:16 hertz 98:12,16 higher 71:6,9 71:14 highest 94:13 95:20,22 96:7 96:14 98:13 hire 27:23 hiring 18:11 hold 87:24 home 85:9,11 hoping 89:20 huge 91:19 hurt 87:8 hz 98:10	impair 7:24 important 6:9 6:15 7:3 54:12 impulses 85:18 87:18 inaudible 10:16 31:20 inception 13:11 13:21 18:19 63:14 inches 83:2 87:20,22 include 47:24 includes 31:25 89:23 90:17 including 5:12 20:14 incorporation 68:2 incorporator 67:25 indemnity 1:6 independent 89:6 indicate 47:22 75:2 96:13 indicated 63:24 individual 18:10,20 55:20 70:20 71:6,10 74:14 individual's 55:21 individuals 5:12 49:22	influence 7:23 information 24:25 26:5 31:2 70:17 informed 91:6 initial 39:9,11 39:13 initials 19:14 inn 68:14,15 69:13,16,19 70:2,6,10 73:17 77:8,9 instructions 6:6 insurance 1:6,7 5:20 115:4 intensity 94:8 94:10,25 96:2 96:4,6,7,14 99:5,10,19,24 100:5 interested 114:15 interpreter 2:22 4:3,15 6:24 11:2 14:17 20:18,19 20:25 23:19,20 26:14,15 34:9 53:12,13 54:9 54:10,25 55:5 72:14,15 79:12 79:13 83:10 95:6 105:6,7,8 105:12,15,19
	i		
	ib 67:15 68:2,8 68:17,20 69:2 69:5,7 73:7 77:3,4 identification 5:23 19:3 25:11 28:14 29:7 30:9 32:3 62:2,18 75:15 90:5,21 images 31:8		

[interpreter - locations]

Page 11

105:22 109:11 109:12 111:8 111:10 investors 32:17 113:18 invoice 80:14 iris 1:21 39:23 114:4,20 iryna 68:3,4,24 79:15,16 island 2:11 105:3 issue 29:4 32:23 39:5 52:19,24 53:3 53:6,8 65:19 65:25 69:25 78:5,12 79:23 109:2,5 issued 28:18 32:9 33:19 34:20 35:12 38:3,10 40:22 41:3,10 43:12 43:18 46:17 51:18 54:20 55:3,9 64:17 67:4,17 68:13 72:12,21 74:10 74:13 75:20 76:19,22 77:2 77:7,12,17,23 78:19 80:9 86:3 89:2 90:9 107:22	issuing 55:19 79:3 110:19 j j 2:8 job 111:9 john 1:13 2:8 july 72:13,23 jurat 111:18 k k 4:2 44:9 karapetian 2:21 keep 85:8 khait 44:8 kickbacks 108:24 kind 8:15 12:24 13:6 38:5 81:7 knew 50:7 78:8 knob 97:14 know 6:13 7:21 8:5 12:13 15:6 15:8 16:15,16 17:18 19:8 21:3 26:22,23 27:4 28:2 33:7 33:8,10,11,13 33:23,24 34:4 38:13 39:17 40:17 44:3,4,8 45:9,12 46:16 49:21 51:14,16 52:10 54:6 60:10 61:3,5	62:4 65:2,12 65:14,19,25 68:7,16,17,22 69:2,6,9,12,13 69:15,18,21,24 70:5 73:6,11 73:16,21 74:2 76:5,8,11 78:4 78:10,11 79:2 82:4,7,8,10 85:10 89:9,12 89:16 93:24 94:5,7,20 97:18,22 98:2 98:16 100:12 100:13,15,20 106:20,21 known 5:7 26:20 29:16 knows 99:10 l l 106:23 large 91:17 law 2:15 7:16 laws 64:3 leave 58:5,8 lecture 14:24 15:2,7 left 85:10 length 82:23 level 98:16 levitan 50:18 levkovich 26:23 74:15,18 75:3	lift 87:5 likely 66:24 75:5 linden 9:24 104:4 line 32:20 74:23 115:6 list 74:8 104:20 105:13 listed 20:15 67:25 lists 19:18 29:4 little 72:18 87:6 live 63:17 llc 1:11 29:13 29:17 32:8,23 33:6,16,20 34:8,19 36:6 37:17 42:2,11 42:21 43:19 62:12 107:23 115:2 llp 2:3 5:6 located 60:10 102:4 location 9:19 45:15,24 57:7 102:15 104:7 105:17 locations 45:9 47:14 48:8 58:16 102:18 102:24 103:11 103:25 104:20 104:23 105:13
---	--	---	--

[locations - mestechkin]

Page 12

106:3,5,13 long 13:16 15:2 26:20 86:6 87:20,22 look 18:2 25:23 39:6 92:2 93:5 looking 91:4 93:4 97:17 98:21 99:23 100:23 107:20 looks 82:10,13 82:15,16,24 lower 87:5 95:17 lowest 94:12 96:6 98:14 lumbar 98:3,25 100:8	machines 81:24 82:5 83:4,7,19 83:23,24 84:2 84:4,11,19,21 85:13 110:8,13 110:17,24 madam 105:12 made 48:13,19 92:25 mail 17:9 24:4 24:8 30:6,15 30:19,22,25 31:13 44:22 58:21 62:23 113:15 mailed 25:25 26:4 mails 24:11,19 31:3 maintain 15:9 41:12 majority 91:20 make 81:12 82:4 84:5 makes 75:10 making 38:22 male 53:13 54:14,18,19 87:3 manager 13:19 13:22 14:2 40:8 49:15 marina 74:14 74:18 75:3	mark 18:25 28:10 30:5 61:22 62:15 90:15 marked 5:16 5:22 19:2,10 25:10 26:7 28:13 30:8,17 32:2 61:25 62:17 75:14 89:22 90:4,20 marking 31:23 75:9 marriage 114:14 massage 85:17 math 46:10,15 matter 4:4 5:7 5:19 114:15 mean 18:9 23:24 34:13 39:11,13 59:8 71:24 86:9 94:9,15 95:14 97:5,7 98:11 100:10 104:10 means 66:4 93:24 94:3,6 94:16,18 98:12 100:13 meant 66:10 measurements 83:2 medical 8:13 8:14,15 9:7,8	12:25 13:3 18:17,22 27:9 36:2 37:11 38:2,9 39:17 57:6,8 58:11 72:10,25 73:7 meet 27:5 30:16 megapolis 64:12,18,19 65:2,12,20 66:2,22,23 69:10 72:12,22 73:2,12 76:23 meladze 1:12 106:22 memo 74:23 mentioned 9:7 47:12 49:14 56:6 82:9 merrick 103:14 message 59:7 messages 17:20 31:4 61:10 mestechkin 2:15,18 7:6 8:23 16:13 19:24 20:7 21:8,14 23:8 24:17 26:25 27:16 40:2,18 43:22 44:13 51:2,6 54:24 55:7,22 59:20 82:21 84:23
m			
m 4:2 11:3 14:21 17:13 50:22 52:11 106:23 m.d. 1:11 2:10 5:14 19:13 20:15 29:5 maaya 60:9 machine 56:22 81:7,12,16,25 82:3,10,18 83:13 85:2,6 87:10,17 94:11 94:17 95:16,17 95:20 96:8 97:11,15			

[mestechkin - obstructed]

Page 13

86:8 91:15 95:3,24 96:5 107:10 108:13 108:15,20 109:14,16,20 110:14,25 111:4,6,13 112:3,10 113:6 met 21:6 27:8 metropolitan 52:2,3,6 103:19 milana 50:16 51:19,20 89:17 milana's 50:18 89:17 minute 44:12 minutes 15:3 21:10,11,13 80:3 87:9 88:2 107:8 mironov 17:15 mironovich 1:12 5:15 12:14 23:24 26:24 88:13 110:11 misinterpreted 8:4 ml 75:20,22,24 76:3,6,9 77:24 77:25 78:5,12 mmh 1:4 model 81:12 82:4,8 84:6	monday 30:23 month 59:2 106:8 108:8 months 107:19 morning 5:4 mother 79:19 79:20 muffled 20:23 multidiscipli... 57:9 multiple 45:14 66:5,12 n n 4:2,11,11,11 4:11 17:13,13 17:13 51:11,11 51:13 52:11 113:2 name 4:18 5:4 9:2,21 10:22 20:17 21:4 26:23 28:2 39:17 45:2 49:5 50:11,18 50:20,24 51:14 51:16 52:20 53:21 54:5,6 63:11 65:4 68:4 70:5,25 73:6,11,16,21 74:2 78:15,16 79:14 82:2 88:15 101:15 106:22 115:3,5	named 12:13 68:3,24 74:14 106:19 names 25:5 40:9 49:21 necessary 20:6 neck 87:2 need 7:9 9:10 10:22 17:25 19:7 21:10 40:15 51:3 111:14 needed 27:7 46:24 needing 61:19 neptune 4:22 new 1:3,12,22 2:5,11,17 4:5 4:14,23 17:2 26:11 60:14 68:14,15 69:13 69:16,19 70:2 70:6,10 73:17 77:8,9 102:9 114:5 115:2 nf 19:17 113:13 nine 98:7 nodding 6:24 non 1:19 2:16 5:9 notary 1:22 3:14 4:4,13 112:18 114:4 115:24	note 24:19 54:25 91:16 99:18 noted 110:14 110:25 112:3 112:11 noticed 20:20 noting 99:4 number 17:3 17:17,22 18:4 19:19 29:7 35:14 36:5,25 37:16 39:4 40:24 41:18 42:3,20 43:6 46:11 47:9 69:8,11,20,23 74:16 76:10 79:9 94:20 95:17 numbers 94:15 95:14 97:2 o o 11:3,3 17:13 17:13 52:11 oath 7:15 objection 23:8 26:25 27:16 40:2,18 43:22 55:22 84:23 95:24 objections 3:9 obstructed 91:19
--	--	--	--

[obviously - paul]

Page 14

obviously 7:18 11:23 23:23 63:8 108:3 109:24 october 28:20 79:8 office 8:14 9:8 9:8,11 13:10 14:6 18:17,22 35:3 36:12 37:5,20 39:10 41:7,20 42:5 42:14,23 43:9 44:5 46:23 47:4 48:17 49:5 56:20 57:2,3,5,6,8 58:12 59:2,3,8 59:9 65:13 66:25 69:3,14 69:23 75:25 110:20 offices 9:21 39:3 okay 7:5,8,13 7:21,22 8:7 15:16 34:18 89:19 96:5,25 105:25 106:9 oleg 2:18 111:12 olesya 11:20 once 46:21 57:18,22 58:3 71:15 94:4	ones 56:12 82:8 online 15:4 ooo 4:10 order 98:24 99:2 originally 24:15 outcome 114:15 outside 74:11 78:19 83:16 own 11:10 16:4 48:20 58:12 83:3,7,23,23 84:2 owned 83:14 83:19 84:5 owner 11:12 15:22 68:14 owns 33:8 65:2 68:17,20 75:22 79:11	47:19,20,21,23 62:16 63:5,16 64:9 67:9,14 68:12 74:13 75:9,18 79:7 89:22 90:2,2 90:16,24 91:5 91:13,21 92:8 92:12 100:21 100:23 101:14 111:17 113:3 113:10,12,16 115:6 pages 39:7,8 47:14,18,25 113:19,22 paid 33:15,15 37:11 38:20 65:22 66:15 71:3,5,9,11,13 71:18,25 83:17 84:15 pain 47:23 85:20 86:25,25 87:5 94:18 parameters 82:19 92:20 93:14 parentheses 96:10 parents 63:20 parking 66:25 67:2 parkway 102:4	part 19:12 49:14 64:10 87:9,12,16,17 87:25 94:19,19 94:21 97:19,23 99:5,11,20 100:2 particular 57:4 parties 3:5 114:13 parts 47:22 56:23 87:7 98:17 party 1:19 2:16 5:9 past 31:5 patient 19:13 39:15 47:22 80:24 81:3,3 85:17 86:9,15 86:16,18,25 87:3,4 88:2,8 88:11 93:11,21 94:4,15 97:20 97:24 98:18 99:6 patient's 87:13 94:11 98:4 99:20 100:2,7 100:8 patients 10:4,7 57:10 109:10 paul 50:16 51:19,20 67:9
	<p style="text-align: center;">p</p> p 4:2,11 p.c. 2:15 p.m. 112:11 page 19:11,11 19:16,16 20:2 20:3,10,15 25:13 29:2,22 31:24 32:7 35:12 36:4,23 37:14 40:21 41:25 42:10,19 43:5 46:8		

[paul's - provide]

Page 15

paul's 50:20	29:3 58:7 68:3	32:14 34:3	preserve 110:8
pay 36:19	68:20,24	39:21,22 50:15	110:17
46:25 52:6	personally 14:7	72:16 86:13,22	preserved
56:2 66:8,23	57:13 78:21	109:13	110:24
67:2,17 76:20	pertaining	pleasure 111:4	pressure 88:17
76:23	110:16	point 71:20,25	88:21 91:7
payment 31:8	phone 8:21	94:24 95:10	92:13 94:8,25
43:2,20 72:11	17:3,17,22,23	96:6 111:15	99:4,10,19,24
73:8 88:12	18:2,4 30:16	portion 19:25	100:5,17
108:23 109:5	31:2 47:7,9	91:17 93:9,17	previously 5:18
payments	61:7 69:7,11	possession	11:24 45:22
59:16 73:14,19	69:20,23 76:10	81:11 85:13	printer 82:16
73:24 74:5,10	photo 61:23	possible 55:10	prior 108:4
79:4 80:9	photograph	possibly 95:10	probably 14:12
108:21 109:2	61:24 113:17	practice 19:17	87:21
pays 38:23	physical 110:23	19:22,22 22:14	procedure 1:24
pdf 64:10 75:9	physically	22:24 27:10,10	proceeding
pelham 102:4	37:18	27:15,24 31:18	1:20
pending 7:11	pick 47:4 84:20	33:12,22 34:5	process 80:23
people 88:7	85:2	36:2 37:11	86:13
perform 9:4,17	picks 99:9	38:2,9 39:17	processing 1:12
11:18 14:7	picture 59:5	45:18 72:10,25	60:14
16:20 18:11	pistol 82:17	73:7,12,17,22	produced
102:17	87:15,19,25	74:3 90:19	34:16
performed 16:8	pkc 1:4	91:24 92:3	proof 31:8
57:13 73:13,18	place 87:13	practices 28:3	properly 57:20
73:22 74:4	placed 110:5	28:8 40:10	propounded
86:23	plaintiffs 1:8	45:3 74:8	4:7
performing	2:4 5:6 28:19	pre 100:18	propriatorship
13:24 39:18	plan 91:14	prepare 60:5	1:11 2:10 5:13
98:23	plaza 2:4	prescribed	29:6,24
performs 81:4	please 4:18,21	88:17	provide 9:9
period 107:17	6:13 9:2 10:24	present 2:12,20	10:5,7 14:14
person 6:17	13:25 14:20	preservation	15:10 18:16,21
12:13 14:4	31:6,9,21	15:14 24:11	22:13,22 27:14

[provide - refresh]

Page 16

27:23 34:6 38:19 45:6,23 56:9,14 57:17 58:18 73:2 74:20 79:20 81:16 83:25 91:3 104:13 106:6,15 107:17 108:22 provided 13:12 30:25 33:2 34:14 35:22 38:24 48:8 49:23 50:12 52:7,13 57:10 59:13 62:22,23 64:3,20,24 65:9 67:18 70:4,6 71:2,17 73:7 75:3,11 78:15 83:22 85:22 86:2,14 88:11,25 89:5 89:24 90:12 106:18 provider 20:16 101:25 provider's 19:18 providers 45:14 provides 12:25 13:8 18:7 80:24	providing 13:17 33:21 40:11 43:2,13 43:21 45:4,13 45:19 46:4,18 58:12 77:4,9 77:14,20,25 83:11 93:11 public 1:22 3:14 4:4,13 112:18 114:4 115:24 pulse 99:24 100:5 pulses 96:2,18 97:3,5,6,10,18 97:22 98:2 purchase 84:11 pursuant 1:23 62:23 89:25 put 49:4,5 63:22 87:15 q queens 103:20 104:5 question 3:10 6:13,14 7:4,11 7:12 8:25 16:14,18 20:25 21:19,22 22:17 33:25 34:2,5 39:20,23 40:4 43:24 44:18 55:11,24 59:21 81:20 97:9,10	107:14 109:13 questions 4:6 6:10,20 14:25 31:10 90:25 108:12,14,16 109:21,25 r r 4:2,2 11:3 17:13 50:22 52:11,22 r40 100:11 radial 88:17,21 91:7 92:13 100:16 radler 2:3 5:6 ralph 9:14,19 102:12 rapawy 2:8 rate 18:21 66:18 67:11 68:10 70:23 71:6,14,18,21 72:7 read 21:18,20 21:24 22:16,18 39:24 44:17,19 55:13 81:21 reason 20:22 115:6 receive 59:12 59:15 received 59:16 72:10 74:9 108:22	receiving 93:22 recess 21:16 44:15 80:4 107:11 recognize 20:17 26:9 28:23 29:22 63:7 68:4 90:8 91:8 92:6,8,14 101:6,17 102:3 104:22 recognized 105:18 recollection 18:2 89:21 record 4:18,21 6:16 19:24 21:20,24 22:18 39:24 44:19 55:13 60:18,20 60:22 81:21 82:21 91:16 104:16,18 105:11 108:17 110:6 112:2,8 114:10 records 31:16 62:21 64:10 75:10 113:19 red 100:11 refer 11:21 12:16 19:21 28:7 refresh 17:25 89:21
---	--	--	---

[regardless - romgo]

Page 17

regardless 55:16 66:14 70:25 reimburse 46:3 46:17 relate 97:3 related 72:11 79:16 96:18 112:6 114:12 relating 5:19 29:23 31:17 59:16 110:12 remark 109:23 remegone 1:11 29:13,16,25 31:19 32:8,22 33:6,16,20 34:8,19 35:13 36:6,24 37:16 38:6 40:23 41:3 42:2,11 42:20 43:7,19 62:12 107:23 109:6 remegone's 86:4 remember 24:7 24:9 27:9,12 28:5 36:22 45:11 47:21 49:25 53:23 54:8 57:7,15 57:25 58:2 60:12 61:6,8,9 61:11,16,17	67:21 70:8 71:19 72:9 73:5,10,15,20 73:25 74:6,19 74:22 75:7,23 78:16 79:25 84:14,17 89:13 89:15 91:12 95:21,22 108:7 108:10 remote 1:20 rendered 108:4 109:9 110:10 repeat 39:23 55:11 59:21 72:16 81:20 105:5 109:12 repeats 20:25 repetition 20:24 34:10 rephrase 6:14 23:14 34:2 39:20 report 39:9,12 39:14 66:6,9 92:14 93:17 96:9 97:17 98:21 99:4,10 100:21,25 reporter 1:21 4:17,20 6:8,16 21:21,25 22:19 39:25 44:20 55:11,14 81:22	reporting 115:2 reports 39:3,6 41:13 59:4 66:4,11,11,12 66:15 78:7,8 100:17 represent 19:15 46:12 62:20 67:24 request 24:19 34:9 110:3,18 requested 29:23 31:6 requesting 12:2 111:11 112:4 requests 110:23 reserved 3:10 reserves 110:2 respective 3:4 respond 8:24 31:16 response 12:6 75:11 responsibilities 14:2 responsibility 14:3 responsive 24:14 results 47:24 81:6 86:21 returns 60:3,6	reviewing 31:15 richmond 105:3 106:13 right 7:21 8:5 21:11 25:6,19 38:20 42:8 50:3 80:20,21 94:25 99:11 105:21 rights 110:2 rivkin 2:3 5:5 road 2:16 103:14,17 104:25 106:11 romgo 2:15 10:25 11:3,7 11:16,21,22,24 12:19,24,25 13:7,11,16,19 13:22,25 14:2 14:8 15:20,23 16:2,8,10,17,22 17:3,9 18:7,8 18:10,11,19 22:13,21 24:13 24:15 27:23 28:11,19 31:11 31:17 32:9,16 32:23 33:16,21 34:6,20 35:13 36:6,9,24 37:17 40:8,10 41:4,12,17 42:2,12,21
---	---	---	---

[romgo - sealing]

Page 18

43:2,7,13,13,19	107:23 109:8	s	24:20 25:7
43:20 45:3,10	109:17 110:4,8	s 4:11 17:13	27:19,21 28:10
45:18,23 46:3	110:9	52:11 113:9	28:16 30:4,11
46:9,17 47:13	romgo's 16:24	115:6	30:24 31:23
48:4 49:15,24	39:16 45:12	sasha 50:17	32:5 39:22
50:13 51:18,22	48:7,23,25	51:19 53:8	40:5 44:11,17
52:6,8,14,18,24	55:20 56:4	54:2,13,18,20	44:21 51:5,9
53:3,6,8,11,19	58:15 60:24	54:21 67:23	51:10 53:15,17
54:3,21,22	63:11,23 80:16	68:8	54:15,17 55:12
55:18 56:2,10	80:19 81:14	sasha's 51:16	59:23,24 60:17
57:14 59:12,15	82:5 83:13	55:3,9 68:10	60:21,23 61:21
59:19 60:2,6	84:19 92:22	saw 21:4	62:3,15,20
62:13,21,24	93:7,10 99:3	says 25:15,16	63:4 72:4,17
63:14 64:4,7	102:19,25	29:9,12 30:22	72:19 75:8,17
64:11,18,24	103:7,12 104:2	30:23 74:24	80:2,6 81:19
65:10 66:22,22	104:8,11 106:4	93:13 94:23,24	81:23 86:10,12
67:3,9,15,19	106:14	95:10 96:10,23	89:19 90:7,15
68:13 69:25	romgotechser...	97:6	90:23 91:22
70:7,10 71:3,5	30:7	schedule 58:19	92:5 95:5 96:3
72:12,21 73:9	room 22:11	58:21,24 59:2	104:16,19
73:14,19,24	81:2 86:16	59:4 106:4,8	105:4,9,21,25
74:5,10,14,21	88:7	scheduled	106:2 107:7,13
75:4,11,12,20	royzengurt	102:19,25	107:15 108:11
76:19,23 77:3	50:20 67:10	103:7,12 104:2	108:18 109:22
77:8,10,13,15	royzengurt's	104:8,10	110:21 111:3
77:18,21,24	67:11	106:14 110:11	111:11 112:2
78:2,4,19	rpw 101:2	schneider 60:9	113:5
79:10,21,23	113:22	scollan 2:6 5:3	screen 19:6,9
80:8,9,23 81:8	rules 1:23 6:7	5:5,25 7:2	25:8 28:17
83:3,7,14,19	russian 2:22	10:17 11:5	82:18,19 91:18
84:4,13 85:23	4:8,9 7:7	15:13,17 18:24	105:10,12
85:25 86:14	rxr 2:4	19:5 20:4,8,9	107:21
88:7,11,25		21:12,18,22	scroll 90:24
89:6 90:12		22:2,16,20	sealing 3:5
101:12 107:17		23:13,15 24:10	

[section - sole]

Page 19

section 94:9 98:3,6 100:7,8 sections 93:16 see 6:2 19:23 19:25 20:10,14 25:21 28:21 29:3,9,12,22 30:2,12,19 32:11 35:15 59:4 63:5 64:13 65:16 72:23 74:16,23 75:19 96:9 101:4 105:20 105:23 107:25 111:15 112:5 seen 22:7 send 14:5 31:13 sends 87:18 sent 17:8 24:4 30:20 80:14 september 37:14 40:24 served 5:18 11:25 12:19 24:15 31:17 62:24 75:12 service 9:6,18 10:3,11,14,25 11:8,10,16,22 13:2,3 24:16 27:7 28:19 31:11 32:10,24 32:25 33:3 34:20 35:14,21	36:6 41:17 46:13 62:25 64:19 67:15 68:3,8,13,17,21 69:2,5,7 73:7 77:3,4 services 1:13 2:15 13:4,5,7 13:12,13,17 14:8,14 15:11 16:21 18:8,9 18:12 22:14,22 27:14 31:9 35:23 36:16,17 36:20 37:8,23 38:19,24 39:19 40:11 41:10,23 42:8,17 43:3 43:14,21 45:4 45:13,19 46:24 49:23 50:12 52:7,13 56:9 57:10,13 58:12 61:14 64:4,21 64:24 65:10 67:18 70:3 71:2 72:11 73:3,8,13,18,23 74:4,9,21 75:4 76:20,24 77:5 77:10,15,20 78:2,6,21 79:5 79:21 80:24 81:16 83:5,12 83:17 88:12,16	88:25 89:5 90:12 93:11 104:13 106:6 106:15 107:5 108:4 109:9,18 110:10 set 114:8,16 setting 87:10 94:12,13,17 settings 56:22 seven 87:9,20 88:2 98:8 sh 19:14 share 19:6,9 25:8 28:17 105:9 107:21 sharing 105:11 sheepshead 2:16 sheet 115:2 shirt 87:3,6 shockwave 13:10 33:4,17 82:3,9,10 83:4 83:11 85:15,16 86:15 88:21 91:14 92:9 100:25 101:2 113:22 shorthand 1:21 show 56:20,21 105:13 showed 82:22 84:22	shows 81:11 95:15 side 20:3 25:6 sign 39:8 signature 19:18 23:4 24:23 25:3,6,18 114:18 signed 3:13,15 23:11,17 64:15 100:18,20 101:24 signs 86:19 similar 25:23 simple 46:10 sincere 21:8 single 45:14 86:9 sir 19:23 20:11 20:17 25:21 30:2,12,20 32:11 63:5 64:13 78:25 92:6 101:4 104:21 sits 80:25 six 87:20 107:19 skin 85:18 slower 95:17 small 82:15 smirnov 52:10 52:17,25 sole 1:11 2:10 5:13 29:5,24
--	---	---	--

[somebody - take]

Page 20

somebody 50:3 son 89:17 sorry 20:20 21:23 22:17 23:20 26:15 34:10 52:9 53:15 54:11 55:6 95:6 105:8 sort 91:19 sound 6:22 8:6 sounds 6:21 20:4 south 2:11 southern 103:3 speak 6:11 7:10 8:9 12:8,11,18 12:21 31:21 32:13 speaking 7:7 20:19 26:15 53:13 54:10 72:15 79:13 105:8 109:12 speaks 6:17 specific 8:18 33:21 45:7 58:17 63:2 87:12,25 99:11 99:16 specifically 46:14 62:22 65:25 78:12 81:11 90:25 93:15 94:14	97:14 99:18 104:11 specify 55:8 speed 87:10 95:15,20,23 97:11 spell 14:18,20 51:3 spoke 61:7 spoken 22:3 staff 86:18 stain 92:4 started 16:6 starting 29:7 state 1:22 4:5 4:13,17,20 55:6 110:22 114:5 stated 86:17 statement 63:2 113:18 statements 31:7 staten 2:11 105:3 states 1:2 stay 58:6 step 21:10 27:20 48:2 66:7 68:14,15 69:13,16,19 70:2,6,10 71:22 72:20 73:17 77:8,9 80:17 86:11	93:8 stipulated 3:3,8 3:12 stipulations 1:24 3:2 stop 47:3 stopped 61:13 61:19 108:8 store 31:5 stored 17:23 stream 103:15 street 16:25 26:10 35:4 36:12 37:5,19 41:7,20 42:5 42:14,23 43:9 44:5 47:4 48:17 59:9 103:22 104:24 105:2 106:10 106:12 stybel 1:10,11 2:9,10 5:13,14 5:21 19:13,19 19:22 20:15 21:3,6 22:4,7 22:11,14,23 23:12,18 25:15 25:17 27:15,24 29:5,10,24,25 31:18 44:24 90:18 91:24 92:3 109:3 115:4	stybel's 23:4 24:22 25:3 101:15 submitted 19:12,17 90:18 91:24 subpoena 5:17 11:25 12:6,9 12:19,22 24:14 28:12,18,24 29:3,21 30:17 31:16 62:24 75:12 89:25 113:11,14 subscribed 112:16 115:22 sunstone 1:13 107:5 supplies 1:13 107:2 sure 8:22 38:23 44:13 51:5,7 54:11,12 55:12 59:23 82:25 86:10 108:18 sworn 3:15 4:4 4:13 112:16 114:8 115:22 t t 4:2,2,11 44:9 50:22 52:22,22 113:9 take 7:9 27:20 44:11 48:2 59:5 66:7
---	--	---	--

[take - therapy]

Page 21

71:22 72:20 80:2,17 86:6 86:11 87:3 93:8 107:7 111:15 taken 1:20 21:16 44:15 80:4 107:11 takes 87:8 talking 23:10 27:17,19 62:8 tamara 2:21 taught 15:6 tax 29:6 60:2,6 taxes 60:4 teach 14:4 56:7 56:7 tech 1:12 2:15 9:6,18 10:3,11 10:14,25 11:7 11:8,10,16,21 24:15 28:19 31:8,11,17 32:9,23 34:6 34:20 35:13 36:6 41:17 58:13 62:25 68:13 74:24 75:20,22,24 76:3,6,9 77:24 77:25 78:5,13 107:2 109:9 tech's 36:9 technical 13:4 13:7,13,17	14:14 15:11 16:21 56:9 104:13 106:15 technician 13:4 13:7,9 14:8 18:7,12,17,22 22:13,22 27:7 35:23 36:17,20 37:8,23 38:19 38:24 39:18 40:11 41:10,23 42:8,17 43:2 43:14,21 45:4 45:19,24 46:5 46:22 48:25 50:2 55:16 57:13,18 58:4 61:13 64:4,21 64:23 65:8,9 65:21 66:3 67:18,22 70:3 70:6 71:2,7,22 72:2,8,11 73:13,18,23 74:4,9,20 75:3 76:20,24 77:4 77:9,14,20,25 78:6,14,17,20 78:22 79:5,21 80:23,25 81:4 81:5 83:5,12 83:17 85:5 86:14 87:24 88:8,11,16 89:18 90:11	98:23 102:16 106:6 technicians 16:17,20 27:14 27:23 28:4 33:21 34:6 39:16 45:7,13 47:13 48:7,11 48:15,23 49:16 49:23 50:6,12 55:18 56:2,7,8 57:23 58:16,20 60:24 61:19 67:5 71:16,17 73:2 80:16,19 81:8,15 83:13 83:22 84:18 88:24 89:5 92:22 93:7,10 99:3,18 101:12 102:19,25 103:7,12 104:2 104:8,12 106:5 106:14,18 107:18 108:9 techs 45:10 46:19 82:5 tell 35:6,19,25 36:14 37:7,10 37:22,25 41:9 41:22 42:16,25 43:11 45:2 47:2 58:15,19 70:16 98:20 99:22 100:4	ten 44:12 94:13 96:15 98:7 terms 46:11 test 9:5,9 13:10 14:4,5 33:4 47:24 56:21,23 56:24 81:4,5 82:19 86:19,20 86:21,23 88:16 98:23 testified 4:14 11:14 22:6 45:22 testify 7:25 testimony 114:7,10 tests 8:13,15,17 9:13,18 11:18 13:24 33:17 102:17 text 17:19 31:3 59:6,7 61:10 91:21 thank 20:7,8 21:14 30:24 44:13 107:9,10 109:22 111:2,3 111:6,8,10 112:8,10 therapeutic 91:14 92:9 therapy 88:18 88:21,22 91:7 92:13 100:17
--	--	---	---

[thing - visible]

Page 22

thing 88:22 91:20	told 42:7 43:16 46:23 68:19 78:22 104:11	94:4 96:18 101:3 113:22	16:14 58:10 78:10
think 8:3 51:12 53:25 59:22 68:20 70:22 80:3 94:7 97:8 107:8 111:14	top 20:14 25:15 93:12,16 101:16	tremont 105:23 106:11	understanding 88:5,20
third 47:21	touch 82:18	trial 3:11	understands 40:3 43:23 55:23
thirds 20:2	trading 79:10 79:11,24	true 55:17 88:10 114:9	understood 57:19 58:8
thoracic 97:23 98:25 100:6	train 99:17	truthfully 7:25	uniondale 2:5
thought 54:16 97:9	trained 58:8	try 51:2	united 1:2
three 71:17 98:14	training 56:15 56:18 57:16,17 57:22 58:3	trydat 52:21 53:4 71:12,13 71:21,25 72:6 73:22 77:13,14 83:18,18,21 84:2	upper 20:2
time 3:11 6:17 7:20 14:10 16:5 21:17 44:16 57:12 61:6,9,12 80:5 105:24 106:17 107:12,17 108:12 109:25 111:14 112:4,9 112:11	transcript 111:12 112:5 114:9	turning 97:14	use 48:17 81:8 81:9 83:13,19 85:4 99:2
times 85:4 94:2	translate 4:6	twelve 94:13	used 48:7 81:15 81:25 82:6 83:4 97:18,23 98:3 110:9
tin 19:19	translation 55:8 59:22	two 20:2 46:21 75:6,19 82:22 88:7	usually 49:19
title 91:6	translations 2:22	type 100:11	v
titled 92:9,13 100:24	transmitter 100:11	typed 65:16	v 5:20 17:13 52:11 115:4
today 5:8 7:25 62:9 80:8 104:14	treat 10:4 87:12,17	u	vacation 71:16
together 12:5	treated 89:6 93:17 98:18 99:6	u 4:11 14:21	valley 103:14
	treatment 10:5 10:7 85:15,16 85:22,25 86:6 86:15 87:7,8 87:23 88:6 91:14 92:18,19	udeme.com. 14:16	verbal 6:10 7:4
		under 5:14 7:15,23 29:3 29:25 90:18 98:6	veritext 115:2
		underneath 25:18 85:18	versus 94:19
		understand 6:12 7:14	video 7:20
			view 91:3
			virtually 7:19 91:25
			visible 20:3

[w - zooming]

Page 23

w		x	
w 89:2	4:19,22 11:4	x 1:5,15 103:9	108:22,22
waived 3:7	14:18 15:16	113:2,9	110:11
walk 80:22	18:5 40:3	y	yana's 17:17
want 6:5 16:16	43:23 55:23	y 52:22	18:4 26:19
38:20 40:16	82:22 105:14	yana 1:12 5:15	35:3
50:8 91:16	113:3 114:7,11	12:13,17,18	year 13:18
wanted 96:25	114:16 115:5	17:20 23:22,23	14:12 26:21
112:5	word 20:21	23:24 24:2,12	31:6 108:8
watch 56:24	work 8:12	25:25 26:4,20	york 1:3,12,23
wave 88:17,21	10:10 11:18	26:23,24 27:4	2:5,11,17 4:5
91:7 92:13	16:10,21 35:8	27:5,6,10,13,22	4:14,24 17:2
way 55:17	35:10,21 44:2	28:3 34:15,18	26:11 60:14
68:24 99:9,16	50:8 51:22	35:17 36:11,19	68:14,15 69:13
99:22 100:4	52:17,18 53:11	37:2,18 38:5,8	69:16,19 70:2
114:14	53:19 54:3,22	38:23 41:2,9	70:6,10 73:17
we've 43:17	59:13 94:11	41:14,19 42:4	77:8,9 102:9
56:8 62:8 80:7	95:18 106:19	42:13,22,25	114:5 115:2
website 69:5,10	workday 58:7	43:8,11,16	
69:17,23 76:7	worked 10:13	44:2,6,22 45:2	z 106:23
week 46:21	10:21,23 11:6	45:6,10,20	zero 93:25
93:21 94:2,4	50:6 51:23	46:3,19,25	zoom 19:7 20:5
weeks 46:21	57:4 65:21	47:2 48:13,16	20:5,13 32:6
went 59:3	66:25 78:14	49:11 58:15,18	91:2
west 103:14	89:16,17	61:3,7,12,18	zooming 64:9
whereof 114:16	working 16:17	62:7,8,11	
wife 11:19 12:8	95:16 97:12	85:23 86:3	
12:22 15:22	works 33:5	88:13 91:11	
16:7 63:24	44:5 61:3	92:25 100:16	
64:16 70:16	95:20,23	101:8,19,23	
76:12	write 52:5	102:19,25	
wife's 11:17	53:20 54:4	103:7,12 104:2	
63:20 70:12,14	78:22	104:7,10 106:4	
witness 1:19	written 80:10	106:7,14,17	
2:16 4:7,9,12		107:18 108:8	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.